Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D981093628 | IEPA #: 0510350004

Facility Name: Van Tran Electric Corp. | Phone #: 1-800-433-3346

Street Address: 1505 Van Tran Avenue | County: Fayette

City: Vandalia | State: IL | Zip: 62471

Region: 6 | Inspection Date: 06/04/93 | From: 9:00 A To: 10:15 P

Weather: Cloudy 65° F

TYPE OF FACILITY

Notified As: G | Regulated As: Storage

LDF? No (Yes or No) (HPV?) Yes | 90-Day F/U Required?: YES _____ NO _____

TYPE OF INSPECTION

CEI: _____ Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: X Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 9/24/85, from (initial) or (subsequent) Notification.

Initial Part A Date: __/__/__ Amended: __/__/__

Part A Withdrawal requested: __/__/__ Approved by (US)(IL) EPA: __/__/__

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or N __/__/__ Final Permit Issued: __/__/__

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N __/__/__

Illinois Attorney General: (Y) or N 8/14/85 County State's Attorney: Y or N __/__/__

ORDERS ISSUED

CACO: __/__/__ CAFO: __/__/__ Consent Decree: __/__/__

Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1989	1990	1991
S04	No	N/A	Yes	No	*No	No	No	No	No
D01	P+A	N/A	Yes	No	Yes	No	No	No	No

RECEIVED
- 1 JUL 1992
IEPA/DLPC

OWNER		OPERATOR	
Name	Van Tran Electric Corp.	Name	Same
Address	P.O. Box 20128	Address	
City	Waco	City	
State	TX Zip 76702	State	Zip
Phone #	1-800-433-3346	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
No one present on-site		

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Todd Buchanan	IEPA / EPS	618/997-4371
Chris Calnovsky	IEPA / EPS	618/346-5120
Mark Johnson	IEPA / EPS	618/346-5120

PREPARED BY	AGENCY/TITLE	PHONE #
Todd K Buchanan	IEPA / EPS	618/997-4371

SUMMARY OF APPARENT VIOLATIONS

All violations are previously alleged

Area	Class	Section
GWM	I	725.190
GWM	I	725.191
GWM	I	725.192
GWM	I	725.193
GWM	I	725.194

Area	Class	Section

Area	Class	Section

Illinois Environmental Protection Agency 2309 West Main, Marion, IL 62959

DATE: June 18, 1992

TO: Division File

FROM: Todd K. Buchanan TKB

SUBJECT: 0510350004-Fayette County
Vandalia/Van Tran Electric
ILD981093628
Subpart F

A RCRA Comprehensive Groundwater Monitoring Evaluation (CME) was conducted at the Van Tran Electric Corporation's Vandalia facility. Inspection participants were Todd Buchanan (IEPA/DLPC-FOS), Chris Cahnovsky (IEPA/DLPC-FOS) and Mark Johnson (IEPA/OCS-ERU). Chris Cahnovsky was present to conduct a Compliance Evaluation Inspection and Mark Johnson to obtain soil samples for PCB analyses pursuant to TSCA. No representatives for Van Tran were present during the inspection. Only activities pertaining to groundwater monitoring were evaluated in this report.

The facility is currently inactive and for sale. Site operations which consisted of the manufacture and repair of transformers were discontinued in September, 1987. Negotiations concerning closure, groundwater monitoring and site remediation are currently being conducted between the Agency and Van Tran. Existing units located on the site include a former surface impoundment (S04) and a drum storage area.

A RCRA groundwater monitoring program has not been developed or implemented at the facility. During the inspection existing monitoring wells installed during the Superfund Remedial Investigation were visually inspected and photographed (see attached IEPA photos). The wells appeared to be intact and were locked at the time of the inspection.

Since the facility is inactive and a RCRA groundwater program has not been implemented a CME checklist was not completed. The following continuing apparent violations were observed during the June 4, 1992, CME.

725.190(a)	725.193
725.191	725.194
725.192	

RECEIVED
- 1 JUI 1992
IEPA/DLPC

Illinois Environmental Protection Agency 2309 West Main, Marion, IL 62959

0510350004-Fayette County
Vandalia/Van Tran Electric
ILD981093628
Subpart F

COMMENTS

Appendix A-1

2. The facility has not designed, implemented, operated or maintained a groundwater monitoring system capable of determining the facility's impact upon the uppermost aquifer underlying the facility, and which complies with (IAC) Title 35 Subtitle G sections 725.191 through 725.194.

TKB:6/24/92

CC: Marion Region
Mike Grant/DLPC-Collinsvile

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: IL0981093628 IEPA Number: 0510350004

Major Facility: YES/NO Notified As: ~~Non~~ - Gen Regulated As: TSD

Facility Name: Van Tran Electric Corp.

Street: 1505 Van Tran Avenue

City: Vandalia State: IL Zip Code: 62471

Phone: 800-433-3346 County: Fayette

Facility Contact Official: _____ Branch/Organization: _____

Title: _____

Region: 7 Date of Inspection: 6/4/92. Time: (From) 9:00A (To) 10:15A

Type of Inspection: (GWM) RR F/U ___/___/___ (Date of Initial Inspection)

Preparer Information:

Name:
Todd K Buchanan

Agency/Title:
IEPA/EPS GW Coord.

Telephone:
618/997-4371

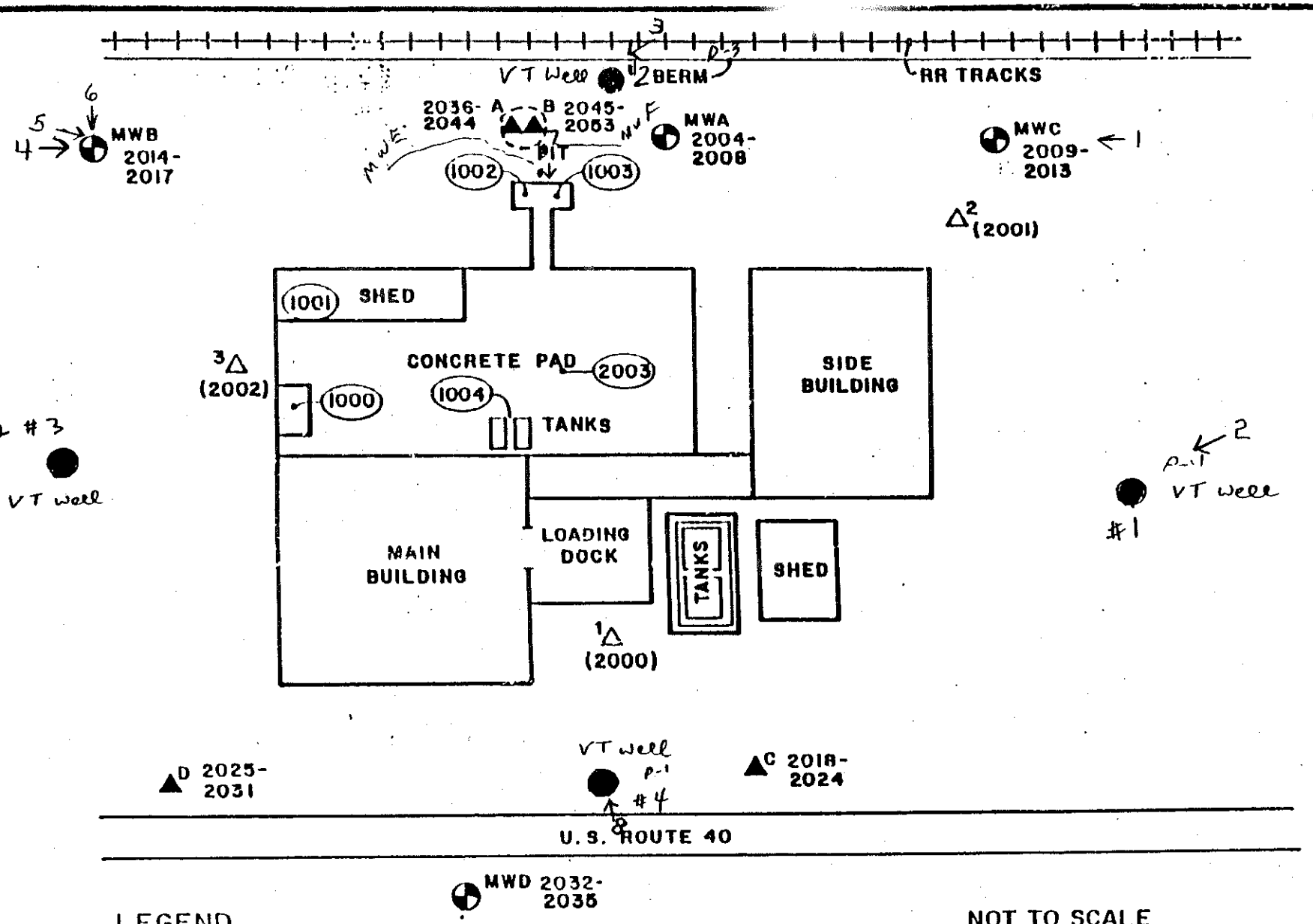
Section	Class I	Class II
725.190	1	
725.191	1	
725.192	1	
725.193	1	
725.194	1	
TOTAL Class I's & II's	5	-

Type of facility: (check appropriately)	YES	NO	UNKNOWN	WAVIED
a) surface impoundment	X			
b) landfill				
c) land treatment facility				
d) disposal waste pile*				

Groundwater Monitoring Program

1. Was the groundwater monitoring program reviewed prior to site visit? if "NO",		X	No program in place
a) Was the groundwater program reviewed at the facility prior to site inspection?		X	No one on site
2 Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)		X	See comments

*Listed separate from landfill for convenience of identification.



LEGEND

- WIPE SAMPLE
- WELL
- BORING
- SURFACE DRAINAGE
- ( ) CORRESPONDING SAMPLE NUMBERS

NOT TO SCALE

FIGURE 1

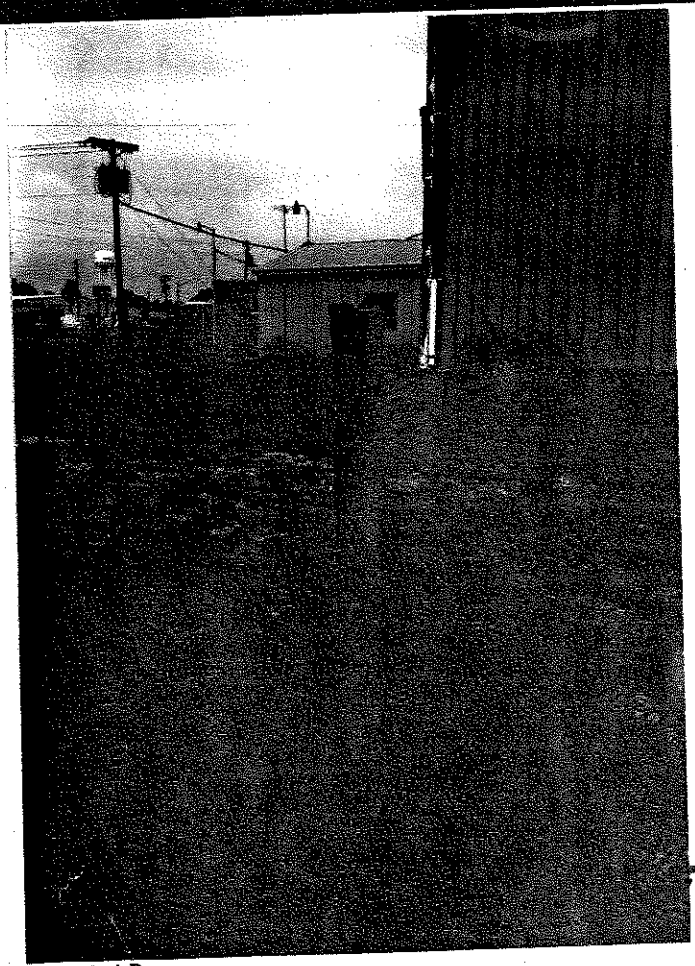
IEPA Photo Locations → 6-4-92

VAN TRAN ELECTRIC

INSPECTION PHOTOS

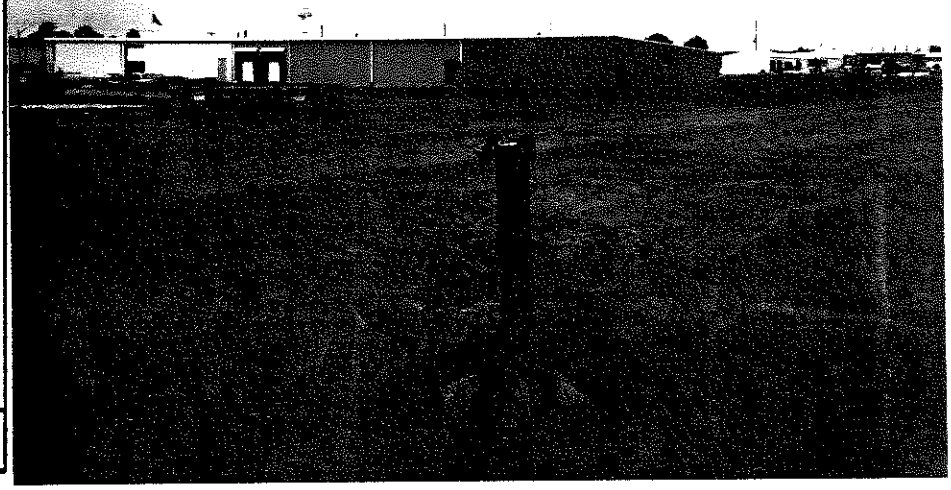
DATE: 6 /04 /92	SITE #: 0 5 1 0 3 5 0 0 0 4 CO.: Fayette
TIME: 9:15 a.m.	SITE NAME: Van Tran Electric
PHOTOGRAPH TAKEN BY: Todd K Buchanan	
COMMENTS: Pictures taken toward: West	
ROLL #: M-503 PHOTO #: 1	

DATE: 6 /04 /92
TIME: 9:20 a.m.
PHOTOGRAPH TAKEN BY: Todd K Buchanan
COMMENTS: Pictures taken toward: Southwest
ROLL #: M-503 PHOTO #: 2

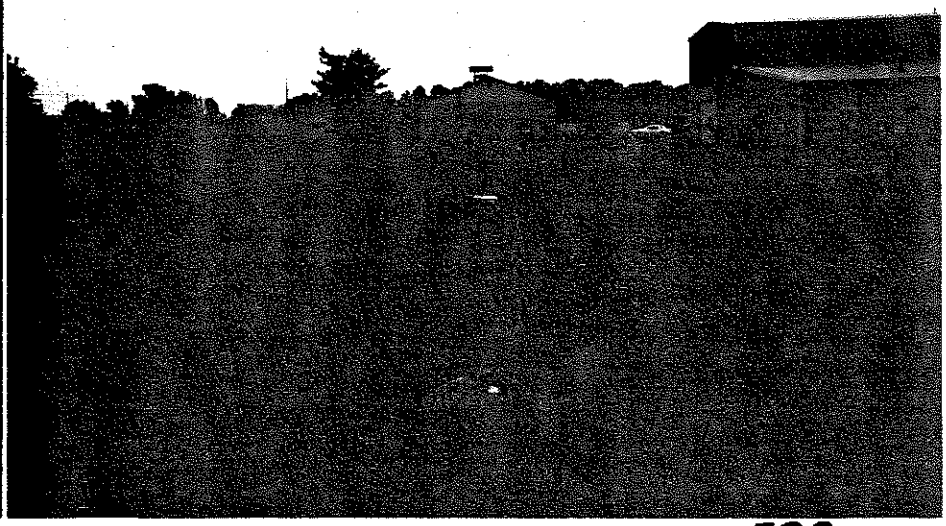


INSPECTION PHOTOS

DATE: 6 /04 /92	SITE #: 0 5 1 0 3 5 0 0 0 4 CO.: Fayette
TIME: 9:25 a.m.	SITE NAME: Van Tran Electric
PHOTOGRAPH TAKEN BY: Todd K Buchanan	
COMMENTS: Pictures taken toward: Southwest	
ROLL #: M-503 PHOTO #: 3	



DATE: 6 /04 /92
TIME: 9:30 a.m.
PHOTOGRAPH TAKEN BY: Todd K Buchanan
COMMENTS: Pictures taken toward: East
ROLL #: M-503 PHOTO #: 4



FOS

INSPECTION PHOTOS

DATE: 6 /04 /92

SITE #: 0 5 1 0 3 5 0 0 0 4 CO.: Fayette

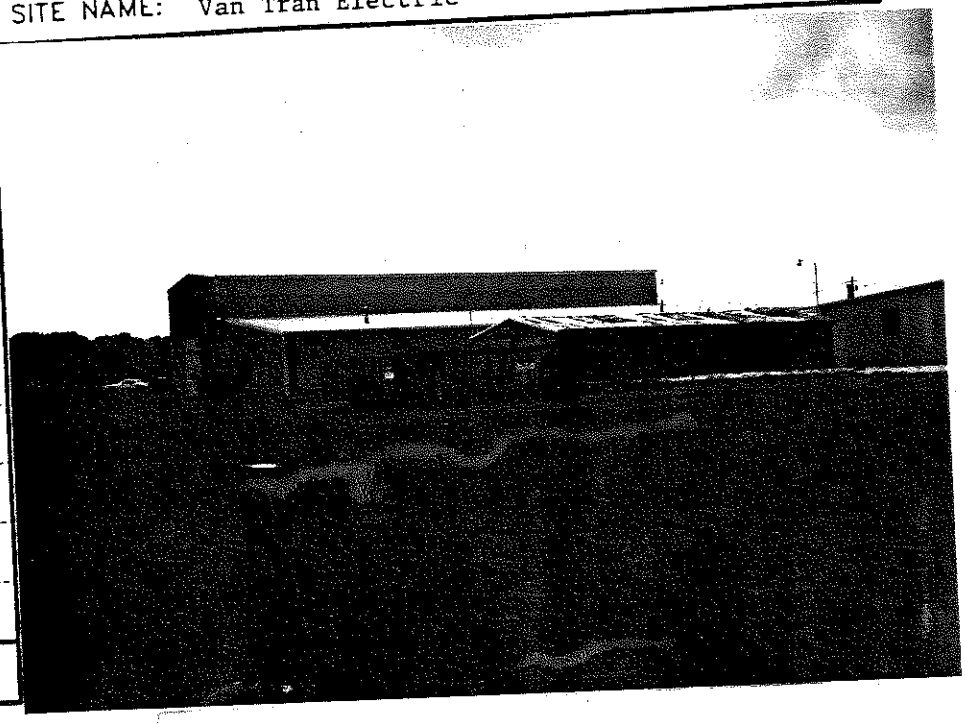
TIME: 9:31 a.m.

SITE NAME: Van Tran Electric

PHOTOGRAPH TAKEN BY: Todd K Buchanan

COMMENTS: Pictures taken toward: Southeast

ROLL #: M-503 PHOTO #: 5



DATE: 6 /04 /92

TIME: 9:32 a.m.

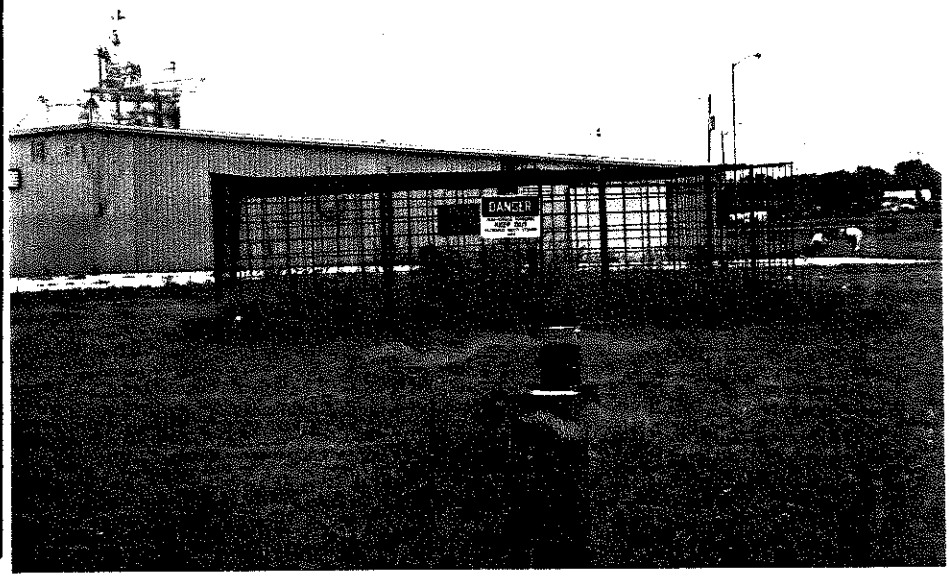
PHOTOGRAPH TAKEN BY: Todd K Buchanan

COMMENTS: Pictures taken toward: South

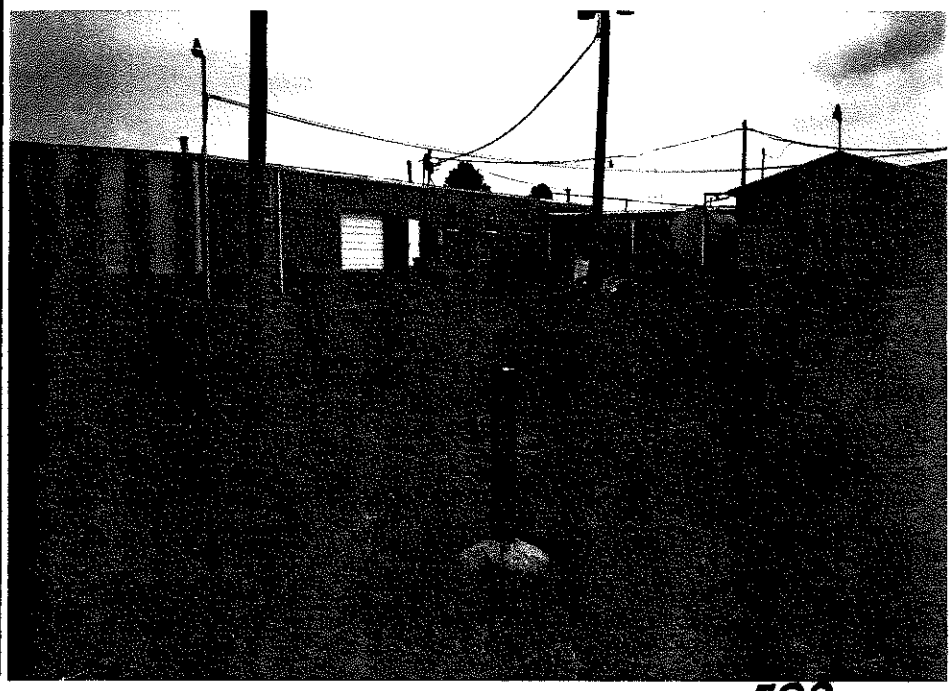
ROLL #: M-503 PHOTO #: 6

INSPECTION PHOTOS

DATE: 6 /04 /92	SITE #: 0 5 1 0 3 5 0 0 0 4 CO.: Fayette
TIME: 9:40 a.m.	SITE NAME: Van Tran Electric
PHOTOGRAPH TAKEN BY: Todd K Buchanan	
COMMENTS: Pictures taken toward: South	
ROLL #: M-503 PHOTO #: 7	



DATE: 6 /04 /92
TIME: 9:50 a.m.
PHOTOGRAPH TAKEN BY: Todd K Buchanan
COMMENTS: Pictures taken toward: Northwest
ROLL #: M-503 PHOTO #: 8



FOS

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

CUNNINGHAM 1

USEPA #: IL D981093628	IEPA #: 0510350004
Facility Name: Van Tran Electric Corp	Phone #: 1-800-433-3346
Street Address: 1505 Van Tran Ave.	County: Fayette
City: Vandalia	State: IL. Zip: 62471
Region: 6	Inspection Date: 11/21/93 From: 10:30a.m. To: 10:50a.m.
Weather: Cloudy 39°F — Rainy	

RECEIVED OCT 21 1993 WMD RCRA RECORD CENTER

Compliance C.1

TYPE OF FACILITY

Notified As: G 2	Regulated As: SD
LDF? Yes (Yes or No) HPV? yes	90-Day F/U Required?: YES _____ NO X

TYPE OF INSPECTION

CEI: X Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 9/24/85, from (initial) or (subsequent) Notification.

Initial Part A Date: __/__/__ None Amended: __/__/__

Part A Withdrawal requested: __/__/__ Approved by (US) (IL) EPA: __/__/__

PART B PERMIT APPLICATION

Part B Permit Submitted: Y or (N) __/__/__ Final Permit Issued: __/__/__

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N __/__/__

Illinois Attorney General: (Y) or N 8/14/85 County State's Attorney: Y or N __/__/__

ORDERS ISSUED

CACO: __/__/__ CAFO: __/__/__ Consent Decree: __/__/__

Federal Court Order: __/__/__ State Court Order: __/__/__ IPCB Order: __/__/__

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 1989	1990	1991
S04	No	N/A	yes	no	*no	no	no	no	no
S01	Pt A.	N/A	yes	no	yes	no	no	no	no
	* partially	Removed and backfilled.							

RECEIVED FEB 01 1993 IEPA-DLPC

OWNER	OPERATOR
Name Van Tran Electric Corp	Name Same
Address P.O. Box 20128	Address
City Waco	City
State Tx Zip 76702	State Zip
Phone # 1-800-433-3346	Phone #

PERSON(S) INTERVIEWED	TITLE	PHONE #
No one present		

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Chris Cahnovsky	IEPA/EPS II	618/346-5120
Gina Search	IEPA/LSCT	618/346-5120

PREPARED BY	AGENCY/TITLE	PHONE #
Chris Cahnovsky	IEPA/EPS II	618/346-5120

SUMMARY OF APPARENT VIOLATIONS

*All violations Previously Alleged

Area	Class	Section	
DOR	I	703.150(a)	*
DMR	II	725.175	*
DSI	I	725.328	*
DCL	I	725.212a	*

Area	Class	Section

Area	Class	Section

0510350004 - Fayette County
Vandalia/Van Tran
ILD981093628

Remarks

A compliance evaluation inspection was conducted on January 21, 1993 at the former Van Tran Electric Corporation site. Present during this inspection were Chris Cahnovsky and Gina Search (IEPA/BOL). Currently, the facility is unoccupied and for sale. Operations were discontinued in September, 1987. The facility was involved in the manufacture of 5-5000 KVA transformers and operated a warranty repair shop for transformers. No representatives for Van Tran were present at the time of the inspection.

Negotiations concerning the closure and cleanup of the site are currently being conducted between the Agency and Van Tran. Existing units at the site include a former surface impoundment (S04) and drum storage area (S01).

The surface impoundment was used for the disposal of paints and solvents. PCBs were detected in the area. The impoundment was backfilled and is now enclosed within a fence structure. The area of the impoundment is approximately 10 ft^2. The drum storage building contains five drums of contaminated soil from the impoundment excavation, five gallons of spent solvent and five gallons of filter media. These drums are being stored under a tarp inside of secondary containment. Also present are 12 drums of decontamination water and six drums of contaminated soil from the installation of the groundwater monitoring wells. At the time of the inspection, standing water from a leak in the roof was observed in the secondary containment. The eighteen drums outside of the containment are in a deteriorating condition.

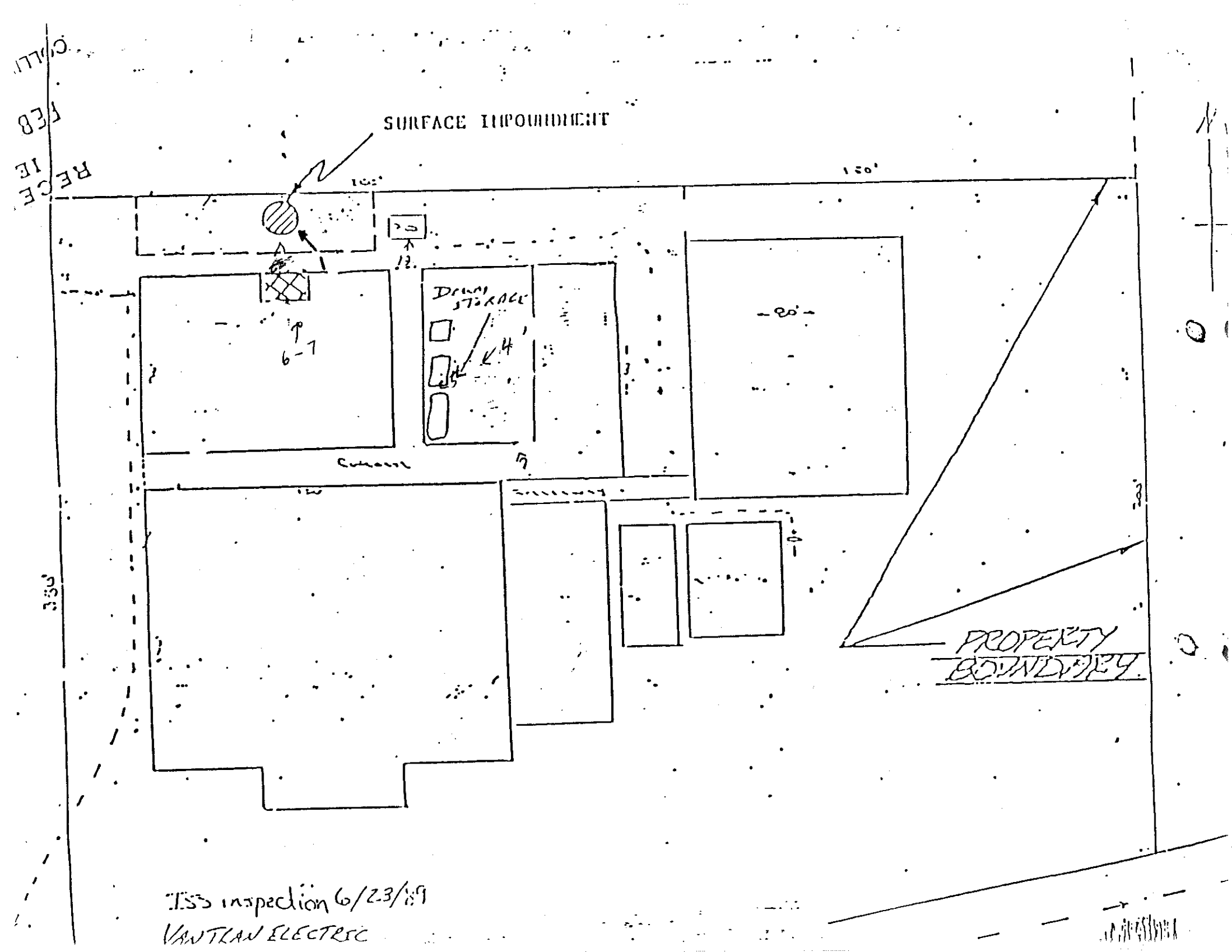
Signs and notices are posted on the building and impoundment fence warning of hazardous waste. The containers were observed to be in good condition with no sign of leakage.

Since the facility is shut down and closed, a CEI checklist was not completed, as training, emergency procedures and operating requirements are no longer applicable. The following apparent continuing violations were observed:

703.150 - Failure to submit Part A of the permit application.
725.175 - Failure to submit annual reports indicating all TSD activities for 1988, 1989 and 1990.
725.212 - RCRA closure plans for the surface impoundment and drum storage area have not been provided.
725.328 - Failure to remove all waste and contaminated soil from the surface impoundment, as required.

It appeared that no changes have occurred at this site since the June 4, 1992 inspection.

CNC:jlr/0805L



TSS inspection 6/23/89
VANTLAN ELECTRIC

DATE: JANUARY 21, 1993

TIME: 10:30 - 10:50 A.M.

I.D. 0510350004

FAYETTE County

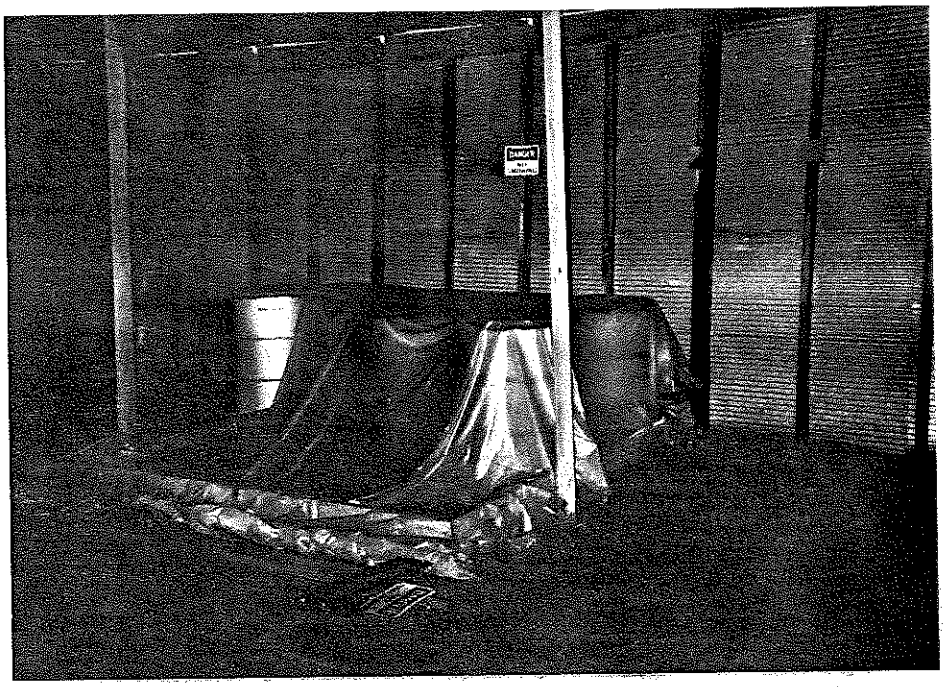
VAN TRAN ELECTRIC CO.

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHWEST

ROLL# 2014 PHOTO# 4

PHOTOGRAPH BY:



DATE: JANUARY 21, 1993

TIME: 10:30 - 10:50 A.M.

I.D. 0510350004

FAYETTE County

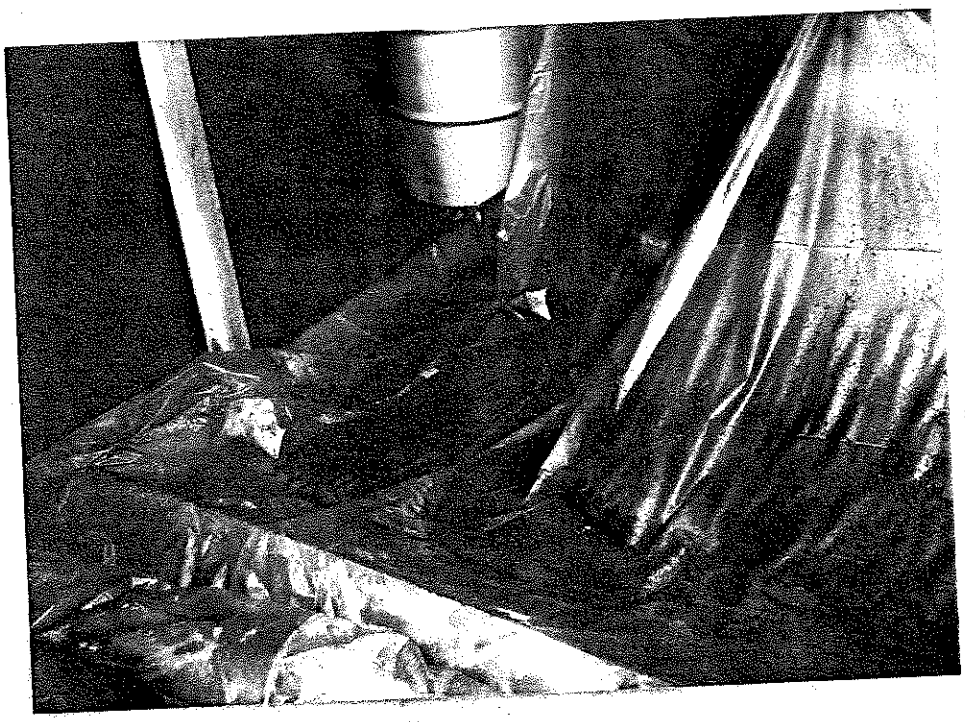
VAN TRAN ELECTRIC CO.

PHOTOGRAPH TAKEN TOWARD THE:

SOUTHWEST

ROLL# 2014 PHOTO# 5

PHOTOGRAPH BY:



)ATE: JANUARY 21, 1993

TIME: 10:30 - 10:50 A.M.

[.D. 0510350004

FAYETTE County

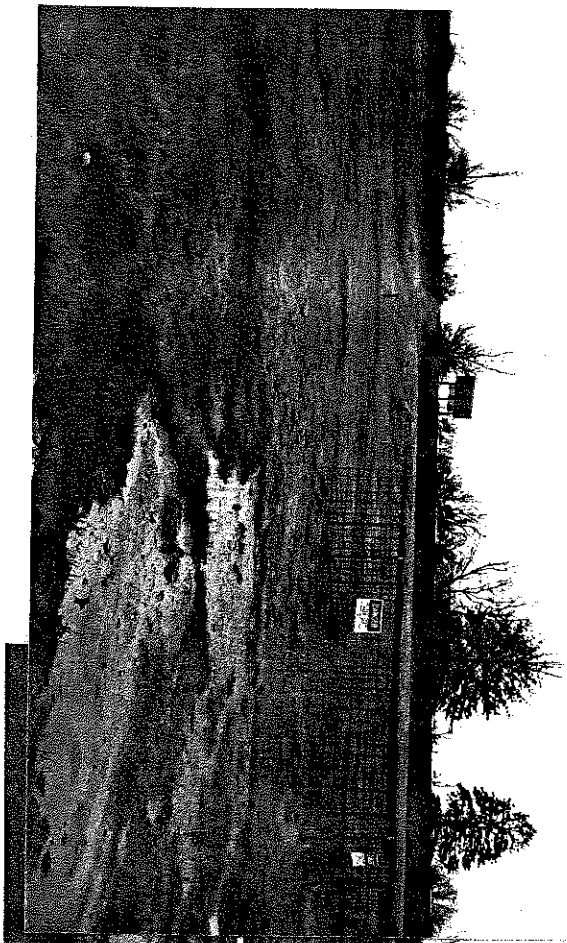
VAN TRAN ELECTRIC CO.

'HOTOGRAPH TAKEN TOWARD THE:

NORTH

:OLL# 2014 PHOTO# 6

'HOTOGRAPH BY:



ATE: JANUARY 21, 1993

IME: 10:30 - 10:50 A.M.

.D. 0510350004

FAYETTE County

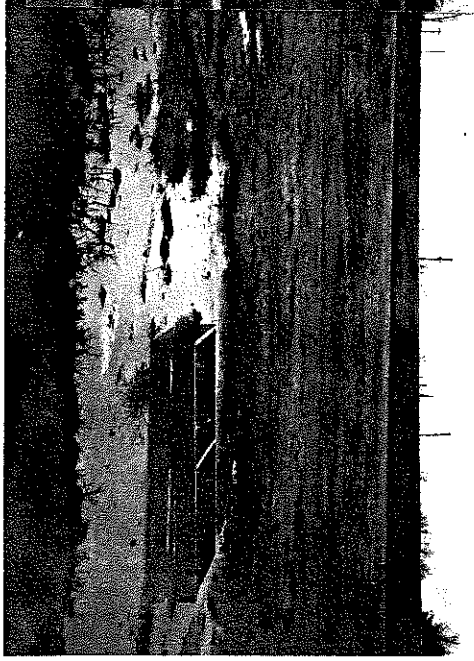
VAN TRAN ELECTRIC CO.

HOTOGRAPH TAKEN TOWARD THE:

NORTH

)LL# 2014 PHOTO# 7

HOTOGRAPH BY:



AUG 23 1994

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D981093628 | IEPA #: 0510350004

Facility Name: Van Tran Electric Corp. | Phone #: 1-800-433-3346

Street Address: 1505 Van Tran Avenue | County: Fayette

City: Vandalia | State: Illinois | Zip: 62471

Region: 6 | Inspection Date: 06/04/92 | From: 9:00Am To: 10:15Am

Weather: Cool, Cloudy ~65° F

TYPE OF FACILITY

Notified As: G-2 | Regulated As: Storage

LDF? no (Yes or No) (HPV?) yes | 90-Day F/U Required?: YES _____ NO X

TYPE OF INSPECTION

CEI: X Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

PART A

Notification Date: 9/24/85, from (initial) or (subsequent) Notification.

Initial Part A Date: ___/___/___ None | Amended: ___/___/___

Part A Withdrawal requested: ___/___/___ | Approved by (US)(IL) EPA: ___/___/___

PART B PERMIT APPLICATION - None

Part B Permit Submitted: Y or N ___/___/___ | Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to -- | USEPA: Y or N ___/___/___

Illinois Attorney General (Y) or N 8/14/85 | County State's Attorney: Y or N ___/___/___

ORDERS ISSUED

CACO: ___/___/___ | CAFO: ___/___/___ | Consent Decree: ___/___/___

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S04	no	N/A	yes	no	*no	NO	no	no	no
S01	P+A	N/A	yes	no	yes	no	no	no	no
			* Partially	Removed & backfilled					

OWNER		OPERATOR	
Name	Van Tran Electric Corp	Name	SAME
Address	P.O. Box 20128	Address	
City	Waco	City	
State	TX	Zip 76702	State Zip
Phone #	1-800-433-3346	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
No one present		

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Chris Cahnovsky	IEPA/EPS I	618/346-5120
Mark Johnson	IEPA/ERU/OCS	618/346-5120
Todd Buchanan	IEPA/EPS	618/785-5719

PREPARED BY	AGENCY/TITLE	PHONE #
Chris Cahnovsky	IEPA/EPS	618/546-5120

SUMMARY OF APPARENT VIOLATIONS

All violation previously Alleged

Area	Class	Section
OTH	I	703.150
OTH	II	725.175
OTH	I	725.328
CI/PC	I	725.212

Area	Class	Section

Area	Class	Section

0510350004 - Fayette County
Vandalia/Van Tran
ILD981093628

Remarks

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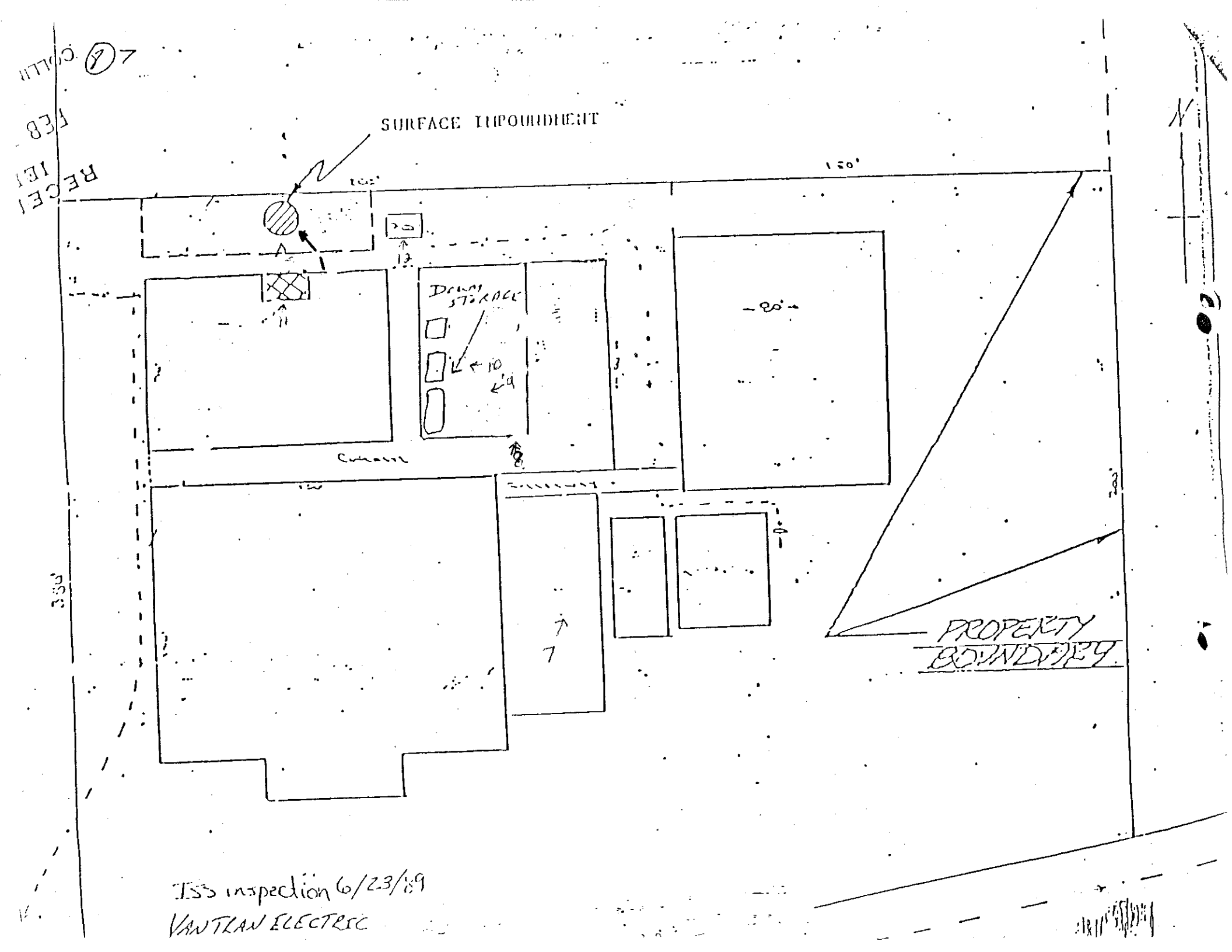
Signs and notices are posted on the building and impoundment fence warning of hazardous waste. The containers were observed to be in good condition with no sign of leakage.

Since the facility is shut down and closed, a CEI checklist was not completed, as training, emergency procedures and operating requirements are no longer applicable. The following apparent continuing violations were observed:

703.150 - Failure to submit Part A of the permit application.
725.175 - Failure to submit annual reports indicating all TSD activities for 1988, 1989 and 1990.
725.212 - RCRA closure plans for the surface impoundment and drum storage area have not been provided.
725.328 - Failure to remove all waste and contaminated soil from the surface impoundment, as required.

It appeared that no changes have occurred at this site since the March 4, 1991 inspection.

CNC:jlr/0805L



TSS inspection 6/23/89
VANTLAN ELECTRIC

DATE: June 4, 1992

TIME: 9:00 - 10:15 a.m.

I.D. 0510350004 - ILD981093628

Fayette County

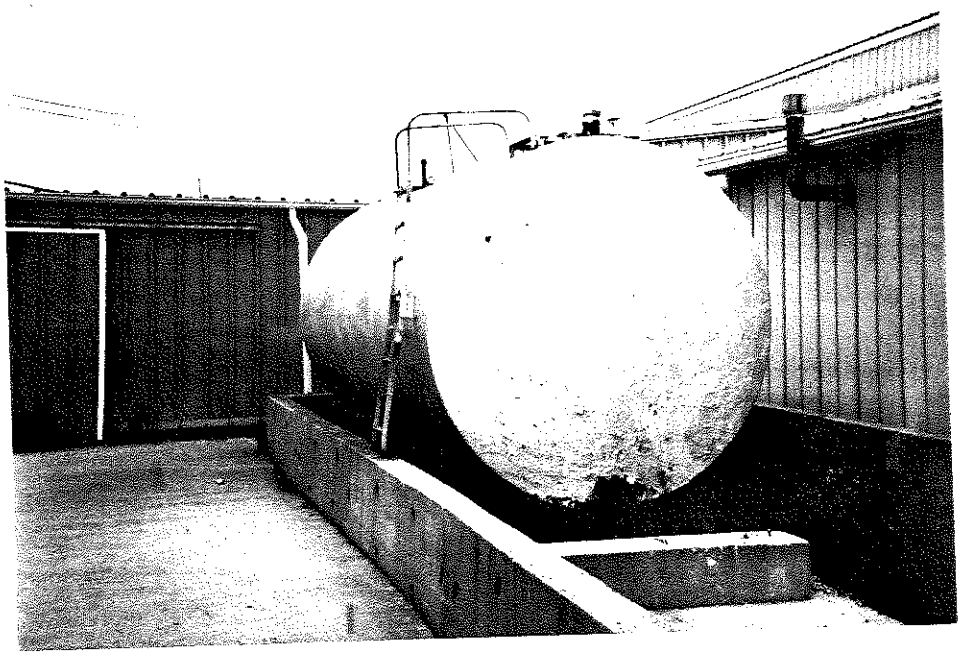
Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

North Northeast

ROLL# 1842 PHOTO# 7

PHOTOGRAPH BY:



DATE: June 4, 1992

TIME: 9:00 - 10:15 a.m.

I.D. 0510350004 - ILD981093628

Fayette County

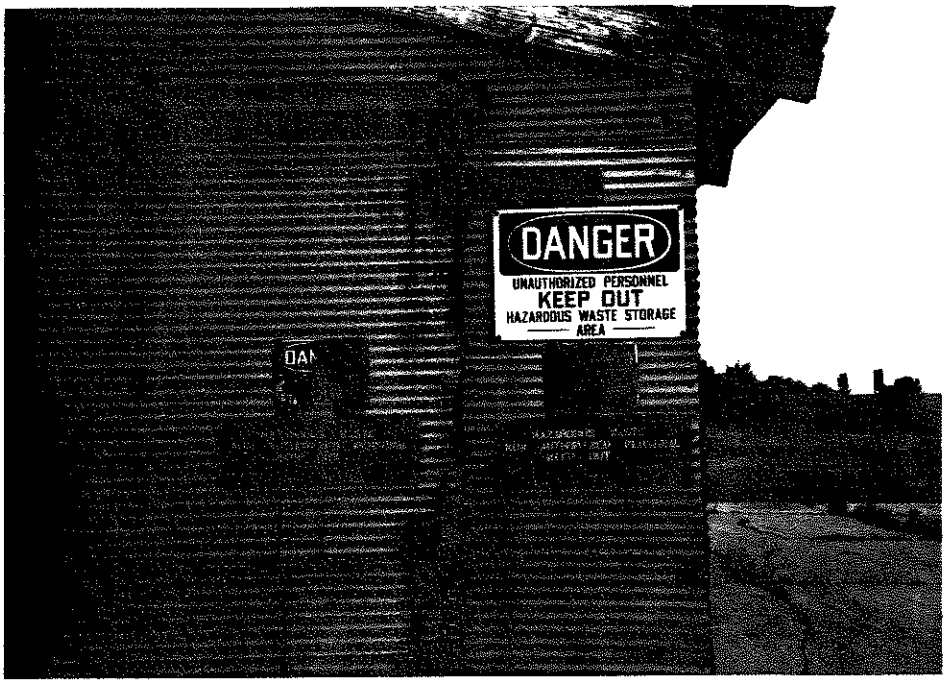
Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1842 PHOTO# 8

PHOTOGRAPH BY:



DATE: June 4, 1992

TIME: 9:00 - 10:15 a.m.

I.D. 0510350004 - ILD981093628

Fayette County

Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 1842 PHOTO# 9

PHOTOGRAPH BY:

DATE: June 4, 1992

TIME: 9:00 - 10:15 a.m.

I.D. 0510350004 - ILD981093628

Fayette County

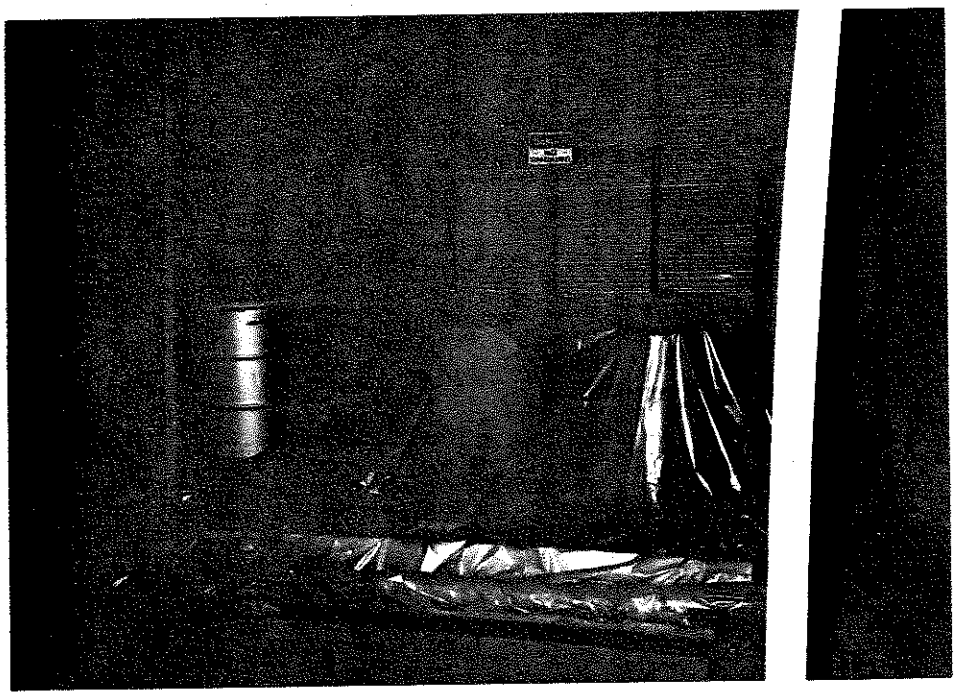
Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1842 PHOTO# 10

PHOTOGRAPH BY:



DATE: June 4, 1992

TIME: 9:00 - 10:15 a.m.

I.D. 0510350004 - ILD981093628

Fayette County

Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1842 PHOTO# 11

PHOTOGRAPH BY:

DATE: June 4, 1992

TIME: 9:00 - 10:15 a.m.

I.D. 0510350004 - ILD981093628

Fayette County

Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1842 PHOTO# 12

PHOTOGRAPH BY:

Illinois Environmental Protection Agency
Division of Land Pollution Control

RCRA INSPECTION REPORT

USEPA #: IL D981093628 IEPA #: 0510350004

Facility Name: Van Tran Electric Corp. Phone #: 1-800-433-3346

Street Address: 1505 Van Tran Avenue County: Fayette

City: Vandalia State: IL Zip: 62471

Region: 6 Inspection Date: 3/12/91 From: 1:00 To: 1:45 pm

Weather:

TYPE OF FACILITY

Notified As: 6-3 Regulated As: Storage

LDF? no (Yes or No) HPV? yes 90-Day F/U Required?: YES _____ NO X

TYPE OF INSPECTION

CEI: X Sampling: _____ Citizen Complaint: _____ Closed: _____ Other: _____

CME/O&M: _____ Record Review: _____ Follow-Up to Inspection of: _____ Withdrawal: _____

NON-REGULATED STATUS

SQG: _____ Claimed Nonhandler: _____ Other (Specify in Narrative): _____

RECEIVED
MAR 29 1991
OFFICE OF RCRA
Waste Management Division
U.S. EPA, REGION V

PART A

Notification Date: 9/24/85, from (initial) or (subsequent) Notification

Initial Part A Date: ___/___/___ none Amended: ___/___/___

Part A Withdrawal requested: ___/___/___ Approved by (US)(IL) EPA: ___/___/___

PART B PERMIT APPLICATION - none

Part B Permit Submitted: Y or N ___/___/___ Final Permit Issued: ___/___/___

ENFORCEMENT

Has the firm been referred to -- USEPA: Y or N ___/___/___

Illinois Attorney General: Y or N 8/14/85 County State's Attorney: Y or N ___/___/___

ORDERS ISSUED

CACO: ___/___/___ CAFO: ___/___/___ Consent Decree: ___/___/___

Federal Court Order: ___/___/___ State Court Order: ___/___/___ IPCB Order: ___/___/___

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 19__	19__	19__
S04	NO	N/A	yes	NO	*NO	NO	NO	NO	NO
S01	Pt. A	N/A	yes	NO	yes	NO	NO	NO	NO

RECEIVED
25 MAR 1991
IEPA/DLPC

* Partially removed & backfilled

OWNER		OPERATOR	
Name	Van Tran Electric Co-p	Name	Same as owner
Address	7711 Imperial Dr.	Address	
City	Waco	City	
State	TX	Zip	76710	State		Zip	
Phone #	1-800-433-3346	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
NONE		

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
Jeff Schoenbacher	IEPA/EPS I	618/346-5120

PREPARED BY	AGENCY/TITLE	PHONE #
Jeff Schoenbacher	IEPA/EPS I	618/346-5120

SUMMARY OF APPARENT VIOLATIONS

* All Previously Alleged

Area	Class	Section
OTH	I	703.150
OTH	II	725.175
OTH	I	725.328
C/PC	I	725.212

Area	Class	Section

Area	Class	Section

Facility Name: Van Trans Electric Corp

USEPA #: IL D981093628

IEPA #: 0510350001

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19	* 19	* 19	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
Facility ceased operation sept. 87						G / F	G / F	G / F				
Equipment was shipped off site.	dismantled & are currently					G / F	G / F	G / F				
Negotiating the disposal for the drum	Closure with					G / F	G / F	G / F				
Storage Areas & the Surface impoundments.						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				
						G / F	G / F	G / F				

* All "NO" responses must be explained in narrative.

REMARKS

0510350004 - Fayette County
Vandalia/Van Tran
ILD981093628

A site inspection was conducted on March 18, 1991 at the former Van Tran Electric Corporation site. Currently, the facility is unoccupied and for sale. Operations were discontinued in September, 1987. The facility was involved in the manufacture of 5-5000 KV transformers and operated a warranty repair shop for transformers. No representatives for Van Tran were present at the time of the inspection.

Negotiations concerning the closure and clean-up of the site are currently being conducted between the Agency and Van Tran. Existing units at the site include a former surface impoundment (S04) and drum storage area (S01).

The surface impoundment was used for the disposal of paints and solvents. PCB's were detected in the area. The impoundment was backfilled and is now enclosed within a fence structure. The Area of the impoundment is approximately 10 ft^2. The drum storage building contains five drums of contaminated soil from the impoundment excavation, five gallons of spent solvent, and five gallons of filter media. Also present are 12 drums of decontamination water and six drums of contaminated soil from the installation of the ground water monitoring wells.

Signs and notices are posted on the building and impoundment fence warning of hazardous waste. The containers were observed to be in good condition with no sign of leakage.

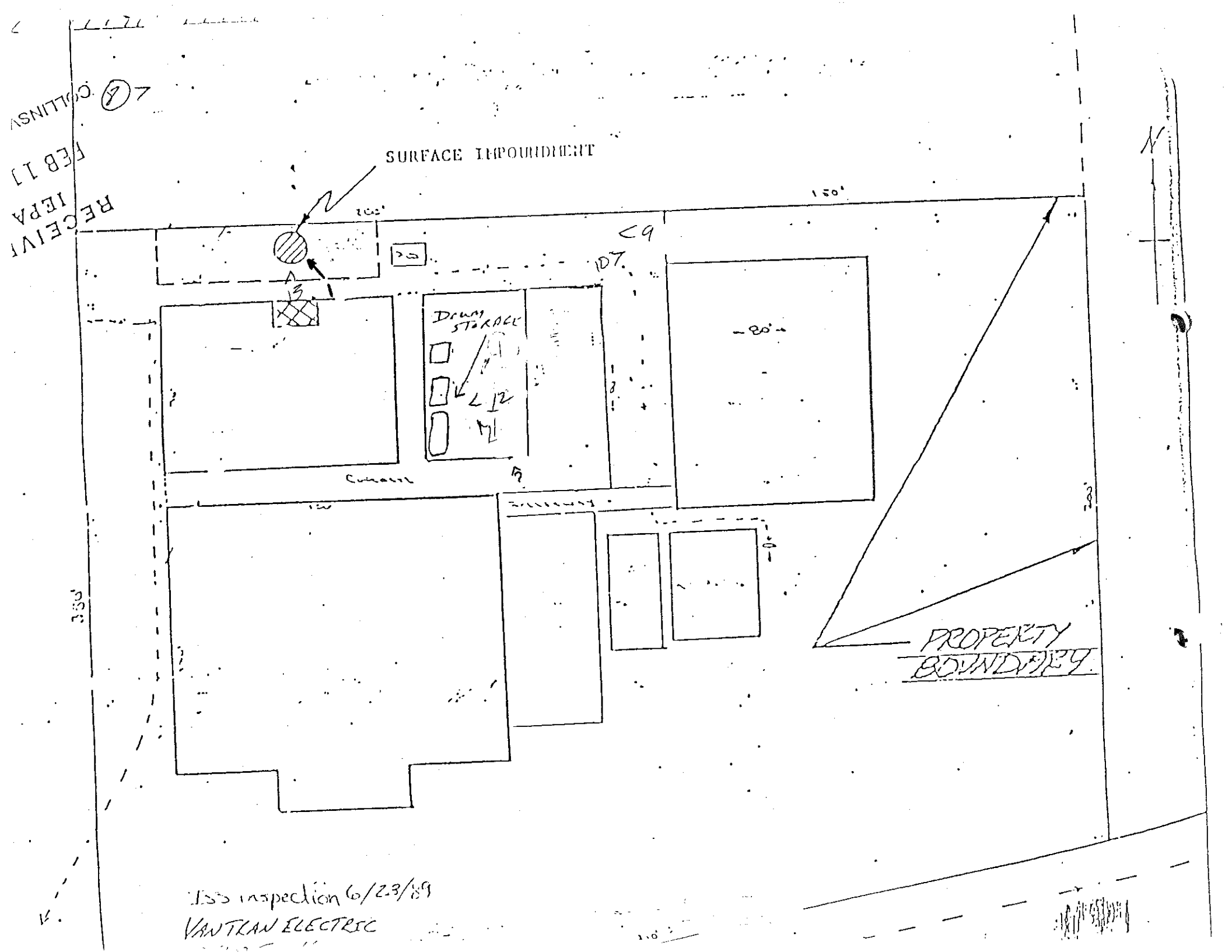
Since the facility is shut down and closed, a CEI checklist was not completed as training, emergency procedures, and operating requirements are no longer applicable. The following apparent continuing violations were observed:

703.150 - Failure to submit Part A of the permit application.

725.175 - Failure to submit annual reports indicating all TSD activities for 1988, 1989 and 1990.

725.212 - RCRA closure plans for the surface impoundment and drum storage area have not been provided.

725.328 - Failure to remove all waste and contaminated soil from the surface impoundment as required.



ISS inspection 6/23/89
VANTRAN ELECTRIC

DATE: March 18, 1991

TIME: 1:00 p.m.

I.D. 0510350004 - ILD981093678

Bond County

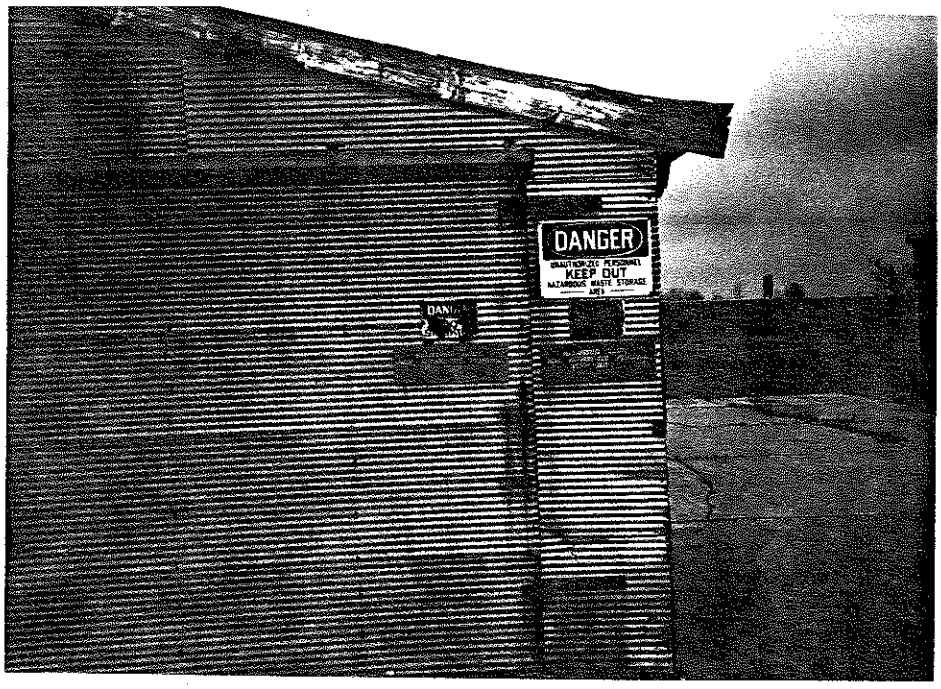
VanTran Electric Corp.

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1506 PHOTO# 7

PHOTOGRAPH BY:



DATE: March 18, 1991

TIME: 1:10 P.m.

I.D. 0510350004 - ILD981093678

Bond County

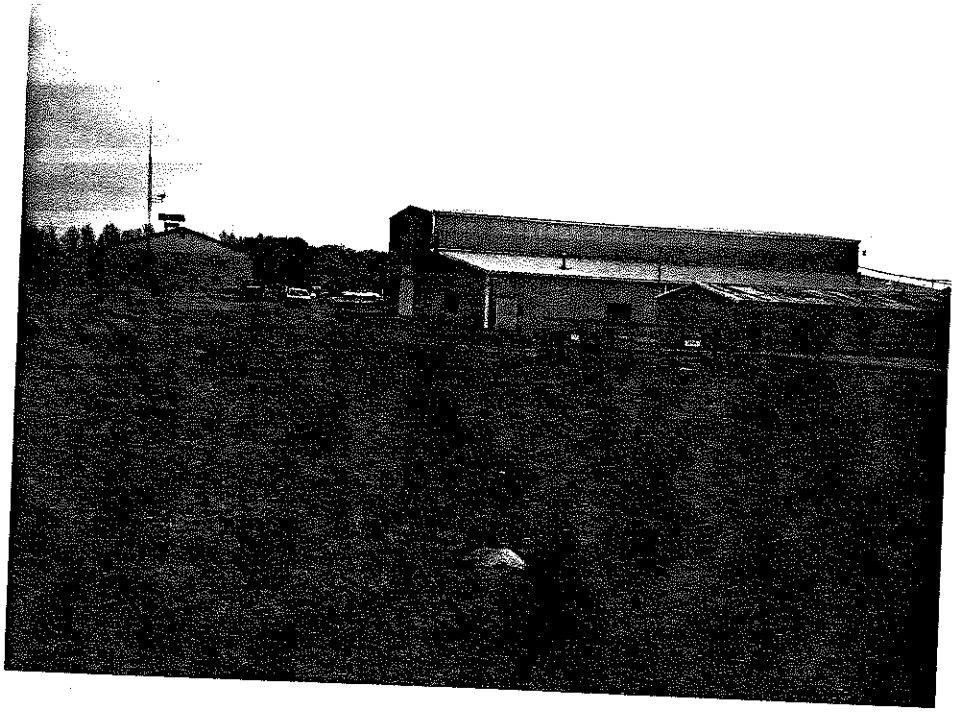
VanTran Electric Corp.

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1506 PHOTO# 8

PHOTOGRAPH BY:



DATE: March 18, 1991

TIME: 1:15 p.m.

I.D. 0510350004 - ILD981093678

Bond County

VanTran Electric Corp.

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1506 PHOTO# 9

PHOTOGRAPH BY:

DATE: ~~March 18, 1991~~

TIME: 1:20 p.m.

I.D. 0510350004 - ILD981093678

Bond County

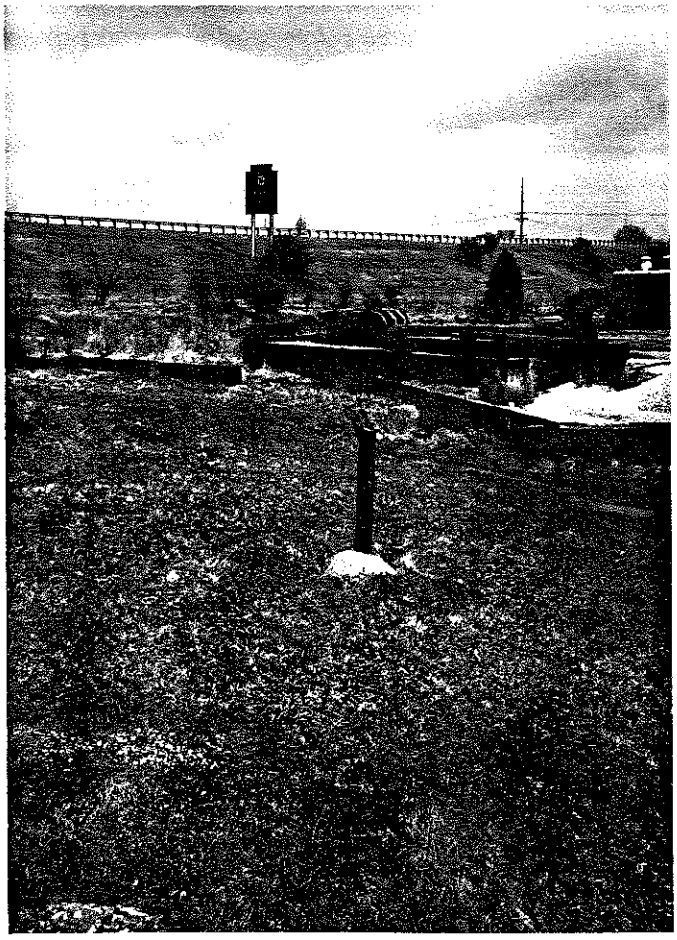
VanTran Electric Corp.

PHOTOGRAPH TAKEN TOWARD THE:

Northeast

ROLL# 1506 PHOTO# 10

PHOTOGRAPH BY:



DATE: March 18, 1991

TIME: 1:25 p.m.

I.D. 0510350004 - ILD981093678

Bond County

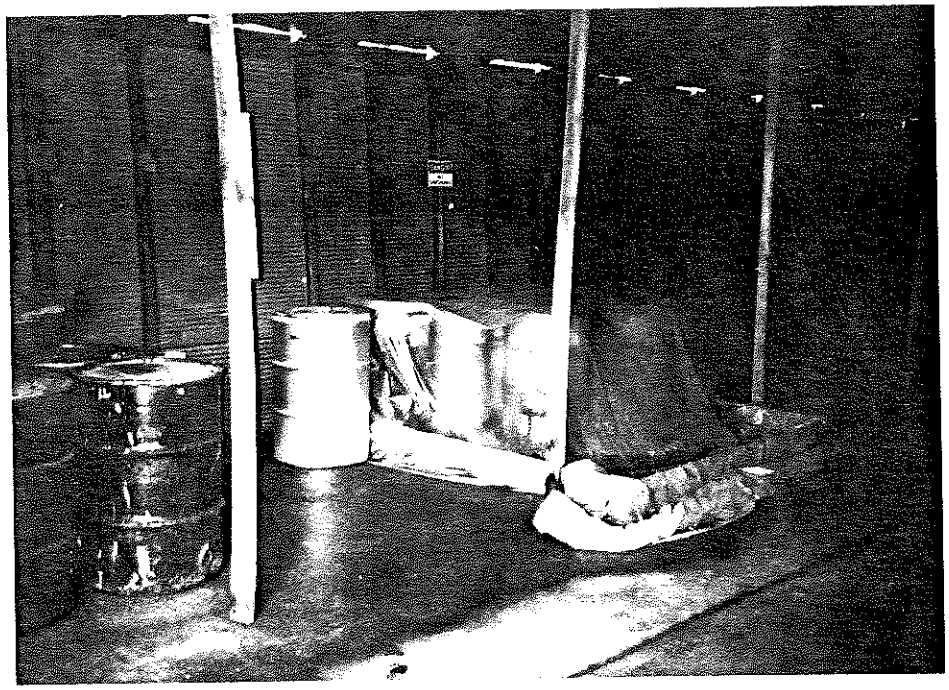
VanTran Electric Corp.

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 1506 PHOTO# 11

PHOTOGRAPH BY:



DATE: March 18, 1991

TIME: 1:30 p.m.

I.D. 0510350004 - ILD981093678

Bond County

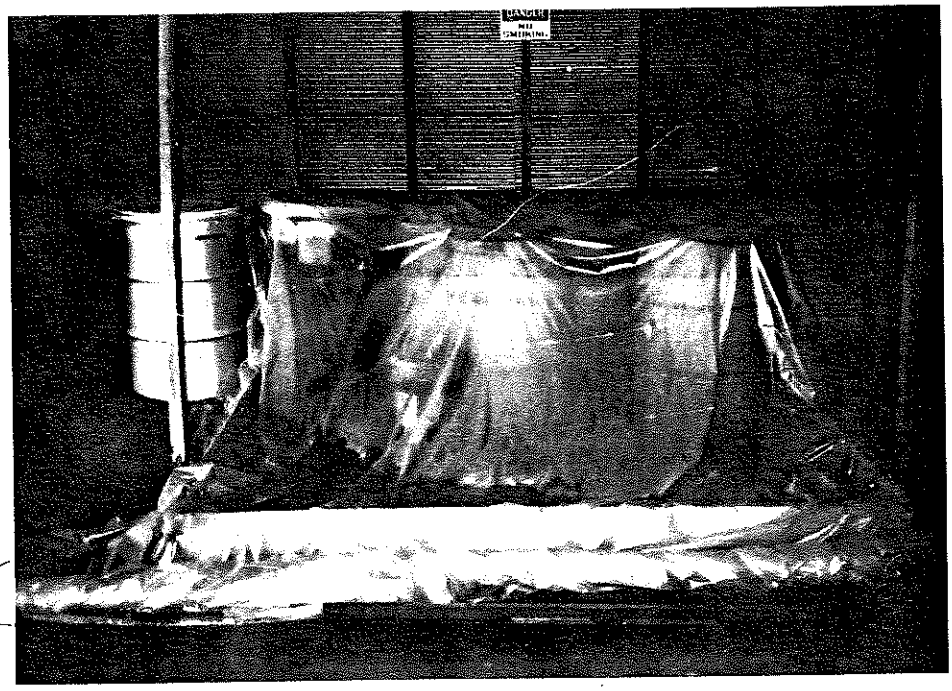
VanTran Electric Corp.

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1506 PHOTO# 12

PHOTOGRAPH BY:



DATE: March 18, 1991

TIME: 1:35 p.m

I.D. 0510350004 - ILD981093678

Bond County

VanTran Electric Corp.

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1506 PHOTO# 13

PHOTOGRAPH BY:

Jeff Rosenbacher

DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

Illinois Environmental Protection Agency
Division of Land Pollution Control

INSPECTION REPORT

USEPA #: IL D981092628 IEPA #: 0510350004

Facility Name: VAN TRAN ELECTRIC CORP Phone #: 1-800-433-3346

Street Address: 1505 VAN TRAN AVE County: FAYETTE

City: VANDALIA State: IL Zip: 62471

Region: 6 Inspection Date: 6/8/90 From: 10:00 To: 10:30

Weather: SUNNY, 75°

TYPE OF FACILITY

Notified As: G-2 Regulated As: STORAGE

LDF? NO (Yes or No) (HPV?) YES 90-Day F/U Required?: YES ____ NO X

TYPE OF INSPECTION

RCRA: X Sampling: ____ Citizen Complaint: ____ Closed: ____ Other: ____

Record Review: ____ Follow-Up to Inspection of: ____ Withdrawal: ____

NON-REGULATED STATUS

SQG: ____ Claimed Nonhandler: ____ Other (Specify in Narrative): ____

PART A

Notification Date: 9/24/85, from (initial) or (subsequent) Notification.

Initial Part A Date: ___/___/___ NONE Amended: ___/___/___

Part A Withdrawal requested: ___/___/___ Approved by (US)(IL) EPA: ___/___/___

PART B PERMIT APPLICATION – NONE

Part B Permit called by (US)(IL) EPA on: ___/___/___ Permit Due: ___/___/___

Part B Permit Submitted: ___/___/___ Draft Permit Issued: ___/___/___

ENFORCEMENT

Has firm been referred to:	USEPA? ____	IAG? X	County SA? ____
Date(s) of initial referral:	___/___/___	8/14/85	___/___/___

USEPA CACO: ___/___/___ CAFO: ___/___/___ ALJ Decision: ___/___/___

Referral to DOJ by USEPA: ___/___/___ Federal Court Order Issued: ___/___/___

PCB Order Issued: ___/___/___ State Court Order Issued: ___/___/___

TSD FACILITY ACTIVITY SUMMARY

Activity by Process Code	On Part A?	Activity Conducted Prior to 1980?	Was Activity Ever Done?	Closed	Being done at Time of Insp.?	Exempt per 35 IAC, Sec.	On Annual Report 57	58	59
S04	No	N/A	YES	No	No *	No	No	No	No
S01	PT. A	N/A	YES	No	YES	No	No	No	No
				*	- PARTIALLY REMOVED & BACKFILLED				

RECEIVED
15 JUN 1990
IEPA/DLPC

SUMMARY OF APPARENT VIOLATIONS

OWNER		OPERATOR	
Name	VAN TRAN ELECTRIC CORP.	Name	SAME AS OWNER
Address	7711 IMPERIAL DR.	Address	
City	WACO	City	
State	TX Zip 76710	State	Zip
Phone #	1-800-433-3346	Phone #	

PERSON(S) INTERVIEWED	TITLE	PHONE #
NONE		

INSPECTION PARTICIPANT(S)	AGENCY/TITLE	PHONE #
STEVE NOBLITT	IEPA / EPS-1	618-346-5120
JEFF SCHOENBACHER	IEPA / EPS-1	"

PREPARED BY	AGENCY/TITLE	PHONE #
STEVE NOBLITT	IEPA / EPS-1	618-346-5120

All Violations Previously Alleged

Area	Class	Section
O/H	I	703.150
O/H	II	725.175
O/H	I	725.328
C/PC	I	725.212

Area	Class	Section

Area	Class	Section

Facility Name: VON TRAN ELECTRIC CORP

USEPA #: IL D981093628

IEPA #: 0510350004

WASTE DISPOSITION FORM

Waste Name (include haz & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste *	* On 8700-12	* On 3510-3	On Annual Report for: (Circle if present; cross out if not present) * 19	* 19	* 19	Amount on Site	Rate of Generation	Last Manifested Shipment	Disposition
FACILITY CEASED OPERATIONS IN SEPTEMBER, 1987. EQUIPMENT WAS DISMANTLED AND SHIPPED OFFSITE. ARE CURRENTLY NEGOTIATING CLOSURE WITH THE AGENCY FOR THE DRUM STORAGE AREAS AND THE SURFACE IMPOUNDMENT.						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				
						G F	G F	G F				

RECEIVED
15 JUN 1990
IEPA/DLPC

* All "NO" responses must be explained in narrative.

0510350004 - Fayette County
Vandalia/Van Tran
ILD981093628

REMARKS

A site inspection was conducted on June 8, 1990 at the former Van Tran Electric Corporation site. Currently, the facility is unoccupied and for sale. Operations were discontinued in September, 1987. The facility was involved in the manufacture of 5-5000 KV transformers and operated a warranty repair shop for transformers. No representatives from Van Tran Corp. were present at the time of the inspection.

Negotiations concerning the closure and clean-up of the site are currently being conducted by the Agency and Van Tran. Existing units at the site include a former surface impoundment (S04) and drum storage are (S01).

The surface impoundment was used for the disposal of paints and solvents. PCB's were detected in the area. The impoundment was backfilled and is now enclosed within a fence structure. The Area of the impoundment is approximately 10 ft^2. The drum storage building contains five drums of contaminated soil from the impoundment excavation, five gallons of spent solvent, and five gallons of filter media. Also present are 12 drums of decontamination water and six drums of contaminated soil from installation of the ground water monitoring wells.

Signs and notices are posted on the building and impoundment fence warning of hazardous waste. The containers were observed to be in good condition with no sign of leakage.

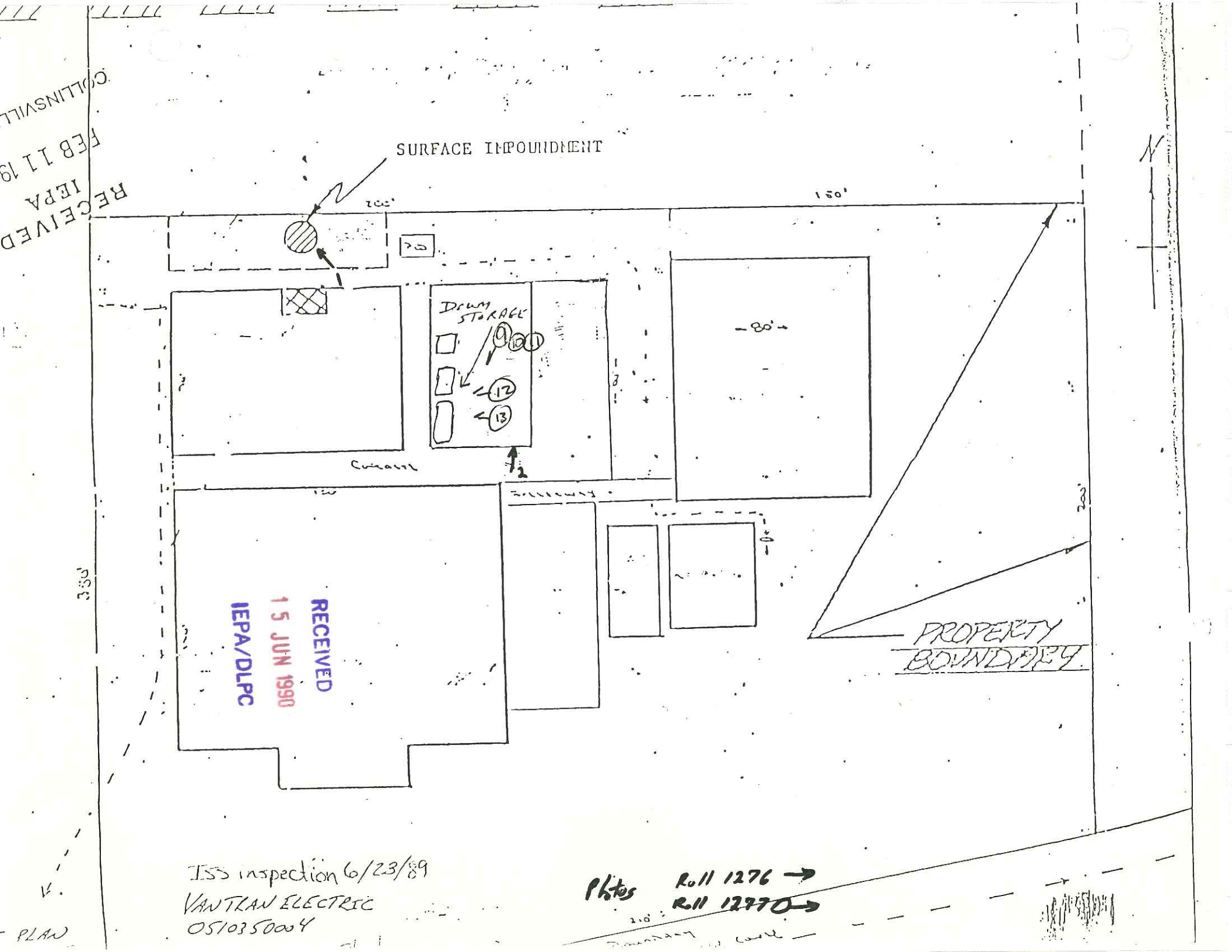
Since the facility is shut down and closed, a CEI checklist was not completed as training, emergency procedures and operating requirements are no longer applicable. The following apparent continuing violations were observed:

703.150 - Failure to submit Part A of the permit application.

725.175 - Failure to submit annual reports indicating all TSD activities for 1987 and 1988.

725.212 - Failure to provide at the facility closure plans for the surface impoundment and drum storage building.

725.328 - Failure to remove all waste and contaminated soil from the surface impoundment as required.


SURFACE IMPOUNDMENT
DRUM STORAGE
PROPERTY BOUNDARY
RECEIVED
15 JUN 1990
IEPA/DLPC
ISS inspection 6/23/89
VANTRAN ELECTRIC
0510350004
Photos Roll 1276
Roll 1277

APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD981093628 IEPA Number: 0510350004

~~Major~~ LDF Facility: (YES) NO Notified As: 63 Regulated As: G/TSD

Facility Name: VAN TRAN Electric CoRP.

Street: 1505 VAN TRAN Ave

City: VANDALIA State: Illinois Zip Code: 62471

Phone: (817) 772-9740 County: Fayette

Facility Contact Official: Steve PARKER Branch/Organization: VAN TRAN - WACO, TX

Title: Vice President - Compliance OfficeR (Not present during inspection)

Region: 6 Date of Inspection: 8/15/89 Time: (From) 2:05PM (To) 2:30PM

Type of Inspection: (GWM) RR F/U ___/___/___ (Date of Initial Inspection)

Preparer Information:

Name: Karen S. Nelson

Agency/Title: DLPC/FOS-Springfield Reg. GW Coord.

Telephone: 217-786-6892

* continuing violations

	Section	Class I	Class II
*	725.190 a	X	
*	725.191 (c)	X	
*	725.192	X	
*	725.193 a	X	
*	725.194	X	
	TOTAL Class I's & II's	5	

Type of facility: (check appropriately)

	YES	NO	UNKNOWN	WAVIED
a) surface impoundment	X			
b) landfill				
c) land treatment facility				
d) disposal waste pile*				

Groundwater Monitoring Program

1. Was the groundwater monitoring program reviewed prior to site visit? if "NO", — X — No Agency approved GWM Program existed at the time of the inspection.

   a) Was the groundwater program reviewed at the facility prior to site inspection? — —

2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater the uppermost aquifer underlying the facility) been implemented? 725.190(a) — X —

*Listed separate from landfill for convenience of identification.

OFFICE OF RCRA WASTE MANAGEMENT DIVISION EPA, REGION V RECEIVED SEP 21 1989

RECEIVED AUG 30 1989 IEPA/DLPC

IL 532-1344

	Yes	No	Unknown	Wavied
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 725.191(a)(1)	X	---	MW-D	---
a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations and depths?)	X	---		
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 725.191(a)(2)	X	---	MW-A, MW-E, MW-F.	
a) Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?	X	---		---
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	X	---	---	
a) If the facility contains multiple waste management components, is each component adequately monitored?	N/A			
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No," explain discrepancies.	X	---	---	
7. Well completion details. 725.191(c)				
a) Are wells properly cased?	X	---	---	
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	X	---	---	
c) Are annular spaces properly sealed to prevent contamination of ground-water?	---	X	---	MWs B+F need surface seal repair. Also VT-4 is in need of repair.

	Yes	No	Unknown	Wavied
8. Has a ground-water sampling and analysis plan been developed? 725.192(a)		X		
a) Has it been followed?		N/A		
b) Is the plan kept at the facility:				
c) Does the plan include procedures and techniques for:				
1) Sample collection?				
2) Sample preservation?				
3) Sample shipment?				
4) Analytical procedures?				
5) Chain of custody control?				
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 725.192(b) and 725.192(c)(1)		X		
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 725.192(b)(1)		X		
2) Parameters establishing ground-water quality? 725.192(b)(2)				
3) Parameters used as indicators of ground-water contamination? 725.192(b)(3)				
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 725.192(c)(2)				
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 725.192(c)(2)				

	Yes	No	Unknown	Wavied
b) For facilities which have completed first year ground-water sampling and analysis requirements:				
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 725.192(d)(1)	—	X - Facility has not completed this first year of sampling		
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 725.192(d)(2)	—	—		
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 725.192(e)	—	—		
d) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 725.191(a)? 725.193	—	—		
10. Has an outline of a ground-water quality assessment program been prepared? 725.193(a)	—	X		
a) Does it describe a program capable of determining:				
1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?	—	—		
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?	—	—		
3) Concentrations of hazardous waste or hazardous waste constituents in ground-water?	—	—		
b) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 725.194(b)(1)	—	—		
1) If a disposal facility, were(are) records kept through the post-closure period as well?	—	—		

	Yes	No	Unknown	Wavied
11. Have records been kept of analyses for parameters in 725.192(c) and (d)? 725.194(a)(1)	___	X		
12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 725.194(a)(1)	___	X		
13. Have records been kept of required elevations in 725.192(e)? 725.194(a)(1)	___	X		

Records have been kept at the facility but are not the result of the required sampling pursuant to 725.192

*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p. 7841-7842) to be coupled with exception reporting in the interim.

APPENDIX A-2

COMPLIANCE FORM FOR A FACILITY WHICH
MAY BE AFFECTING GROUND-WATER QUALITY

Company Name: VAN TRAN Electric ; IEPA I.D. Number: 0510350004

Company Address: 1505 VAN TRAN Ave ; USEPA I.D. Number: ILD 981093628

Vandalia, IL 62471

Inspector's Name: KAREN S. NELSON

Company Contact/Official: Steve PARKER ; Branch/Organization: VAN TRAN - WACO, TX

Title: Compliance Officer ; Date of Inspection: 8/15/89
(Not present during inspection)

Type of facility: (check appropriately)

		Yes	No	Unknown
a)	surface impoundment	X		
b)	landfill			
c)	land treatment facility			
d)	disposal waste pile			

1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) 725.193(b) shown a significant increase (or pH decrease as well) over initial background? — — X

   a) If "Yes," has this information been submitted to the Director according to 725.194(a)(2)(ii)? Facility has not conducted the required sampling to determine this.

2. Have comparisons of indicator parameters for the downgradient wells 725.193(b) shown a significant increase (or pH decrease as well) over initial background? — X

   a) If "Yes," were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 725.193(c)(2) — —

      1) Were samples split in two? — —
      2) Was the significant difference due to human (e.g., laboratory) error? (If "Yes," do not continue.) — —

	Yes	No	Unknown
3. If significant differences were not due to error, was a written notice sent to the Director within 7 days of confirmation?	___	___	
4. Within 15 days of notification of the Director was a certified ground-water quality assessment plan submitted? 725.193(d)(2)	___	___	
a) Does the plan specify 725.193(d)(3):			
1) well information (specifics):			
(a) number?	___	___	
(b) locations?	___	___	
(c) depths?	___	___	
2) sampling methods?	___	___	
3) analytical methods?	___	___	
4) evaluation methods?	___	___	
5) schedule of implementation?	___	___	
b) Does the plan allow for determination of 725.193(d)(4):			
1) Rate and extent of migration of hazardous waste or hazardous waste constituents?	___	___	
2) Concentrations of the hazardous waste or hazardous waste constituents?	___	___	
c) Is it indicated that the first determination was made as soon as technically feasible? 725.193(d)(5)	___	___	
1) Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the Director?		___	___
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground-water?	___	___	
1) If "No," was the original indicator evaluation program, required by 725.192 and 725.193(b), reinstated?	___	___	

	Yes	No	Unknown
(a) Was the Director notified of the reinstatement of program within 15 days of the determination? 725.193(d)(6)	___	___	
e) If it was determined that hazardous waste or hazardous waste constituents have entered the ground-water 725.193(d)(7):			
1) For facilities where a program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis? (If a program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)	___	___	
(a) Were subsequent ground-water quality reports submitted to the Director within 15 days of determination?	___	___	
f) Are annual reports submitted to the Director containing the results of the ground-water quality assessment program? 725.194(b)(2)	___	___	
1) Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents during the reporting period?	___	___	

APPENDIX A-3

INSPECTION COMPLIANCE FORM FOR DEMONSTRATING
A WAIVER OF INTERIM STATUS REQUIREMENTS

Company Name: VAN TRAN Electric; IEPA I.D. Number: 0510350004

Company Address: 1505 VAN TRAN Ave; USEPA I.D. Number: ILD 981093628

Vandalia, IL 62471 Inspector's Name: KAREN S. NELSON

Company Contact: Steve PARKS; Branch/Organization: VAN TRAN, WACO, TX

Title: Compliance Officer; Date of Inspection: 8/15/89

(Not present during inspection)

	Yes	No	Unknown
1. Is a written waiver demonstration kept at the site?	Not Applicable		
2. Is the demonstration certified by a qualified geologist or geotechnical engineer? 725.190(c)	___	___	
3. Does the waiver demonstration establish:			
a) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer? 725.190(c)(1)	___	___	
b) An evaluation of a water balance including:			
1) Precipitation?	___	___	
2) Evapotranspiration?	___	___	
3) Runoff?	___	___	
4) Infiltration? (including any liquid in surface impoundments)	___	___	
c) Unsaturated zone characteristics?	___	___	
1) Geologic materials?	___	___	
2) Physical properties?	___	___	
3) Depth to ground-water?	___	___	

	Yes	No	Unknown
d) The potential for hazardous waste or hazardous waste constituents which may enter the uppermost aquifer to migrate to a water supply well or surface water, by evaluation of: 725.190(c)(2)			
1) Saturated zone characteristics, including:			
(a) Geologic materials?	___	___	
(b) Physical properties?	___	___	
(c) Rate of ground-water flow?	___	___	
2) Proximity of the facility to water supply wells or surface water?	___	___	

APPENDIX A-4

COMMENTS

MH:sd/sp/7321c/1-11

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY MEMORANDUM

ATE: August 15, 1989

TO: Land Division File

FROM: Karen S. Nelson - DLPC/FOS - Central Region

KSN by DGJ

SUBJECT: LPC #0510350004 - Fayette County
Vandalia/Van Tran
ILD #981093628

An annual Subpart F (CME) was conducted at the Van Tran Electric Corporation Facility on August 15, 1989, by Ms. Karen S. Nelson, DLPC/FOS - Springfield Region. This inspection was conducted to evaluate Van Tran's compliance/non-compliance with groundwater monitoring requirements of Part 725, Subpart F, Title 35 I.A.C. Ms. Nelson was accompanied by Ms. Wendy Schaufelberger, DLPC/FOS - Collinsville Region. No one from Van Tran was present during the inspection.

The monitor wells were inspected. The keys for the monitor wells were obtained from Ray's Excavating, the business directly east of Van Tran.

		Condition of:	
Photo #	Well #	Protective Casing	Surface Seal
1	GW-D	rusty	
3&4	VT-4	rusty	upheaved
7&8	VT-1	rusty	
9	GW-C	rusty	
10	GW-A	slightly rusty	
11	VT-2	rusty	upheaved, cracked
12	GW-F		apron completely cracked
12	GW-E	lid rusted tight, couldn't open	
14	GW-B		cracked around edge
(No photo)	VT-3	rusty	

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IEPA/DLPC

IL 532-0570
EPA-90 (Rev. 6/75-20M)

The surface imppoundment (photo 12 & 13) was overgrown with grass. The ditch to the north was dry and devoid of vegetation at the base.

A letter from the DLPC/Permit Section and dated July 18, 1988, outlined the closure and post-closure rquirements of 35 I.A.C., Part 725 for Van Tran's hazardous waste (S04) surface impoundment. Condition No. 8 listed groundwater monitoring requirements that were to be met. It appears Van Tran has met conditions 8a, b, c, d and E. These conditions included installing two new monitor wells downgradient of the surface impoundment, development of the new monitor wells and submittal of boring logs, well completion diagrams and development information to the Agency. Monitor wells E and F were in the process of being installed during the previous Subpart F inspection (Chuck Reeter, DLPC/FOS - Collinsville, inspection of July 12, 1988. The wells were installed by PSI and Baker Engineering. The boring logs, well construction diagrams and well development information was submitted by Van Tran to DLPC/Compliance dated October 19, 1988.

Installation of wells E and F appears to have satisfied the minimum requirements of Section 725.191(a)(2).

However Van Tran has not met the rest of the groundwater monitoring requirements (conditions f-k) listed in the July 18, 1988 letter. A compliance inquiry letter dated August 17, 1989, to Van Tran cited the following apparent violations of 35 I.A.C.: 725.193(d)(4), 725.213(a) and 725.213(b). These apparent violations concern Van Tran's failure to implement a RCRA closure plan and a groundwater quality assessment.

The following apparent violations of 35 I.A.C. remain unresolved from previous inspections:

725.190(a) - Failure to implement a groundwater monitoring program capable of determining the facility's impact on the quality of the uppermost aquifer underlying the facility.

725.191 - Failure to install a proper groundwater monitoring system (i.e., 725.191(c)).

725.192 (all subsections therein) - Failure to implement a sampling and analysis plan.

725.193(a) - Failure to prepare an outline of a groundwater quality assessment program.

725.194 - Failure to implement a record keeping and reporting plan with respect to the groundwater monitoring program.

New apparent violation:

725.191 - All monitor wells must be cased in a manner which maintains the integrity of the borehole and the annular space must be sealed with a suitable material to prevent contamination of samples and the groundwater. Monitor wells VT-4, VT-2, GW-B and GW-F have either upheaved or cracked surface seals which may allow infiltration of surface water into the groundwater zone to be monitored. Those surface seals need to be repaired.

This is not really a newly cited violation because all of 725.191 was originally cited as a result of previous inspections.

Apparent violations resolved:

725.191(a) - A groundwater monitoring program must include at least one monitoring well installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area which will yield samples representative background groundwater quality and is unaffected by the facility.

Monitor well MW-D appears to satisfy this requirement.

725.192(a)(2) - A groundwater monitoring system must consist of at least three monitor wells installed hydraulically downgradient at the limit of the waste management area.

This appears to be resolved with the installation of monitor wells E and F.

A "Draft Work Plan for Remedial Investigation, Van Tran Electric Site, Vandalia, Illinois" dated June 1989 was submitted to Dennis Newman, DLPC/RPMS, by Camp, Dresser and McKee, Inc., who are contracted by RPMS to do this work at Van Tran.

KSN/is/0077L

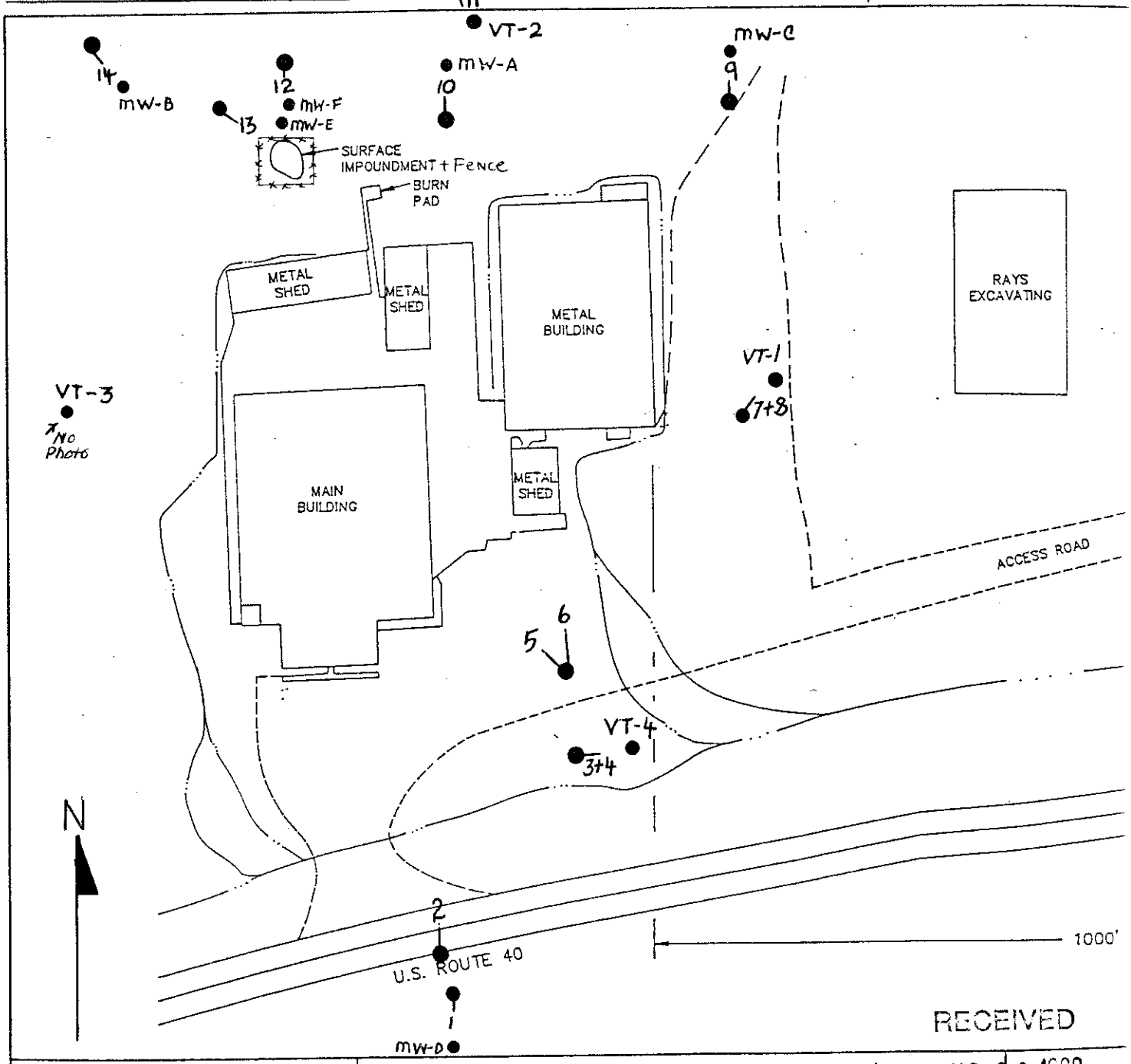
cc: DLPC/FOS - Springfield Region
DLPC/FOS - Collinsville Region
DLPC/Compliance - Ken Liss
DLPC/RPMS - Dennis Newman

LPC 0510350004 - FAYETTE COUNTY
Vandalia / VAN TRAN
ILD 981093628
AUGUST 15, 1989

dry drainage ditch

●-2 Approximate location direction + number of Photo

NOT TO SCALE



RECEIVED
AUG 30 1989
IEPA/DLPC

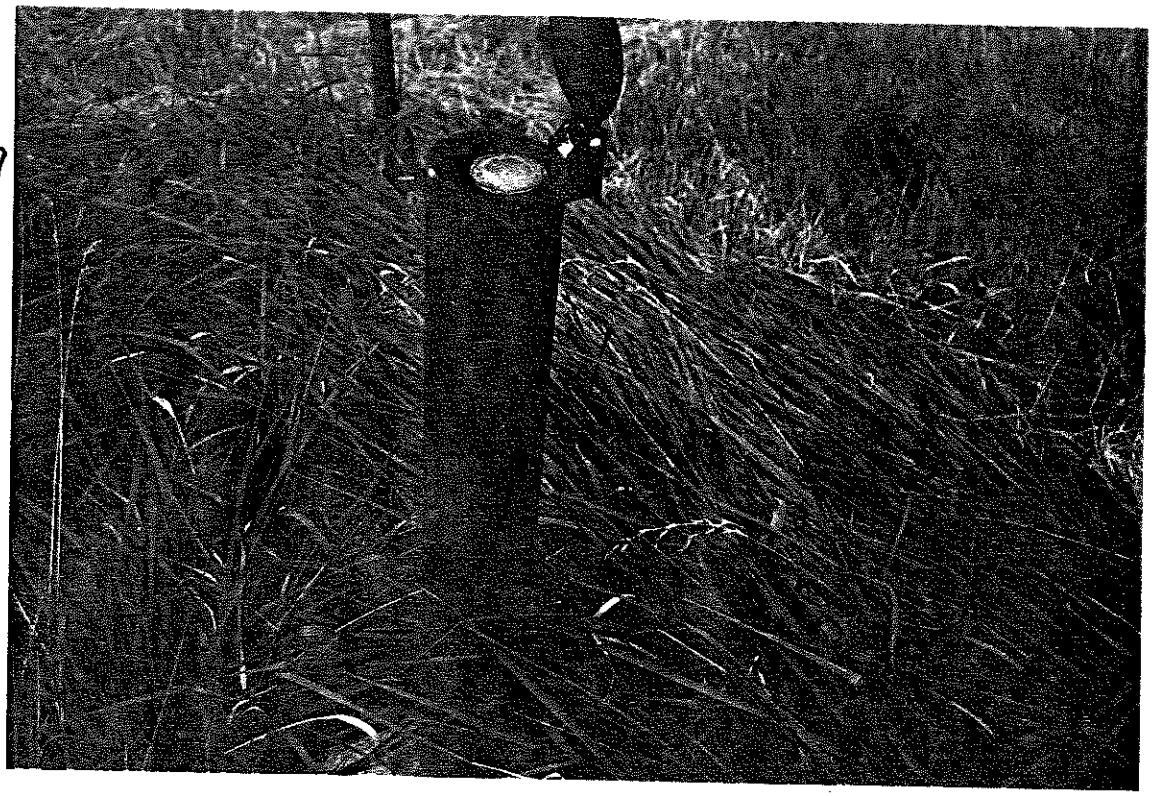
CDM
environmental engineers, scientists, planners, & management consultants

EXISTING monitor Wells at the VAN TRAN ELECTRIC SITE
NOT TO SCALE

MAP TAKEN FROM "Work Plan for Remedial Investigation - VAN TRAN Electric Site - Vandalia, IL by CAMP DRESSER + McKEE," JUNE 1989 and revised by Karen S. Nelson, DLPC/FOS - Springfield REGION.

Date: August 15, 1989
Time: 2:10 A.M. (P.M)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the south

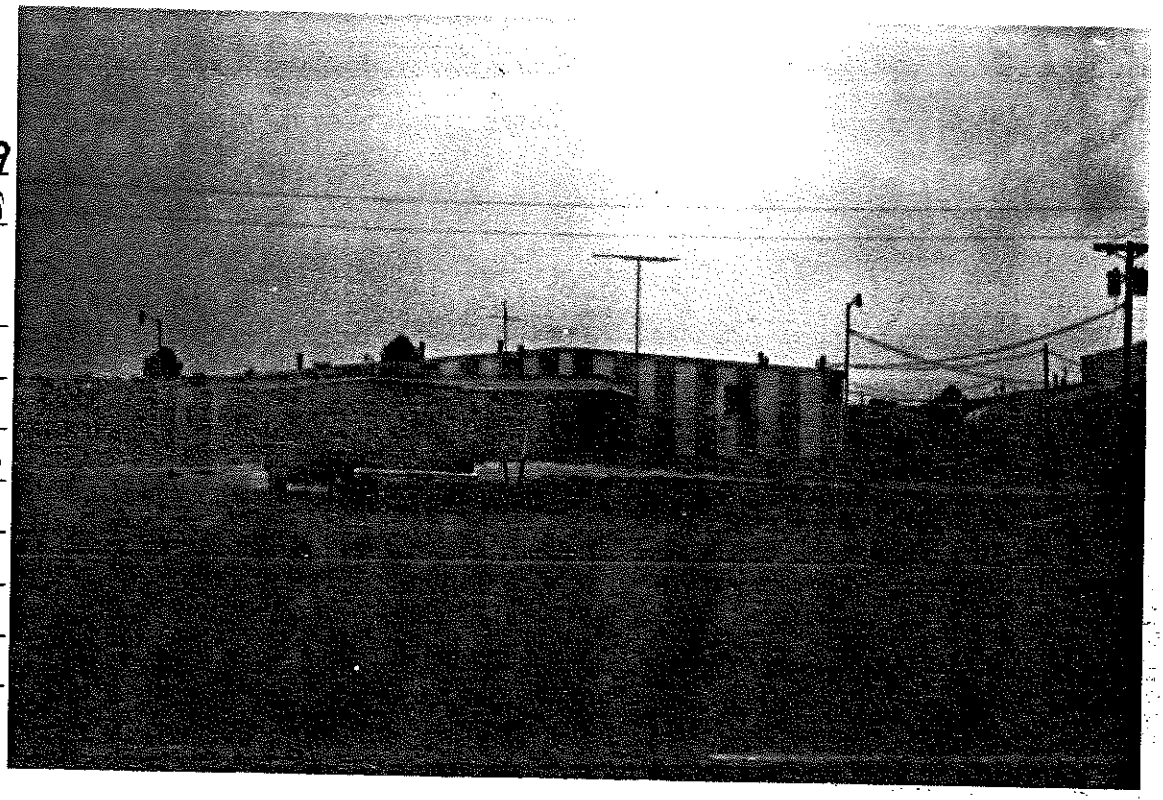
Roll No. 72
Neg. No. 0



(1)

Date: August 15, 1989
Time: 2:10 A.M. (P.M)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the north

Roll No. 72
Neg. No. 1



(2)

Date: August 15, 1989

Time: 2:13 A.M. (P.M.)

Photograph By:

Karen S. Nelson

Location: LPC-0510350004

Fayette Co.

Vandalia/Van Tran

Comments: Photograph taken toward the east

Roll No. 72

Neg. No. 2

(3)

Date: August 15, 1989

Time: 2:13 A.M. (P.M.)

Photograph By:

Karen S. Nelson

Location: LPC-0510350004

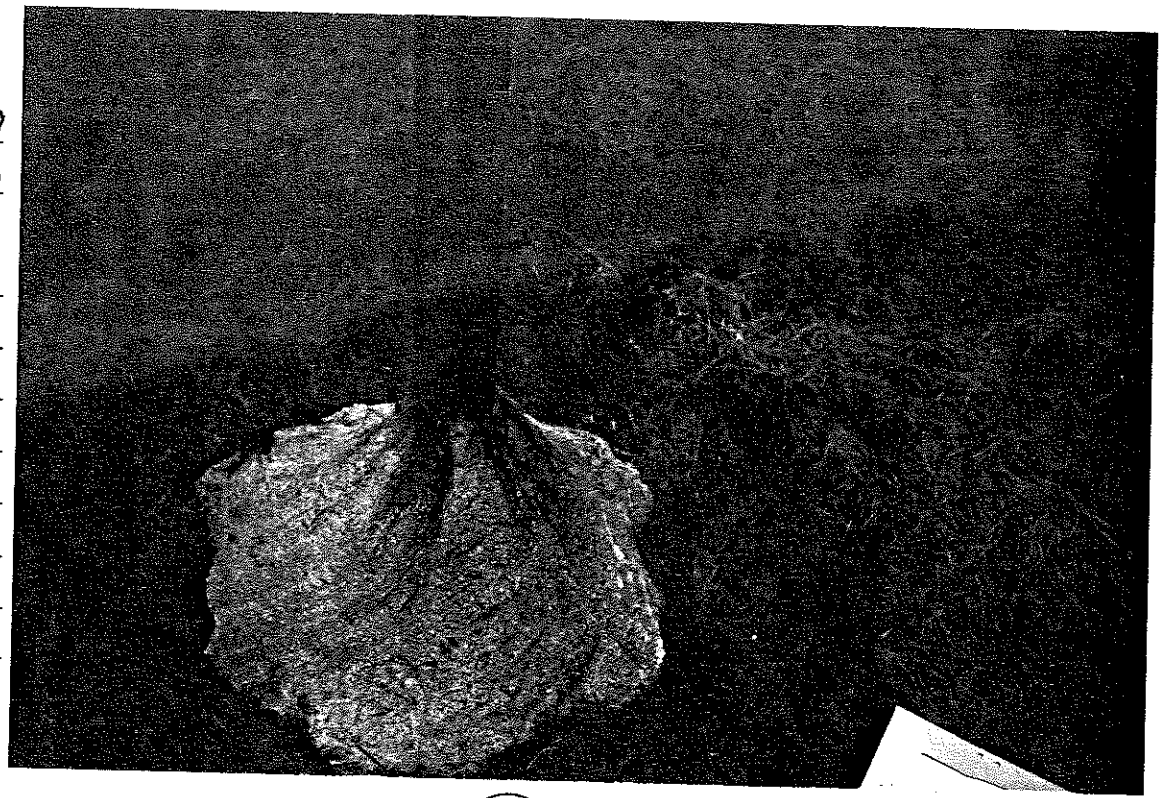
Fayette Co.

Vandalia/Van Tran

Comments: Photograph taken toward the east

Roll No. 72

Neg. No. 3



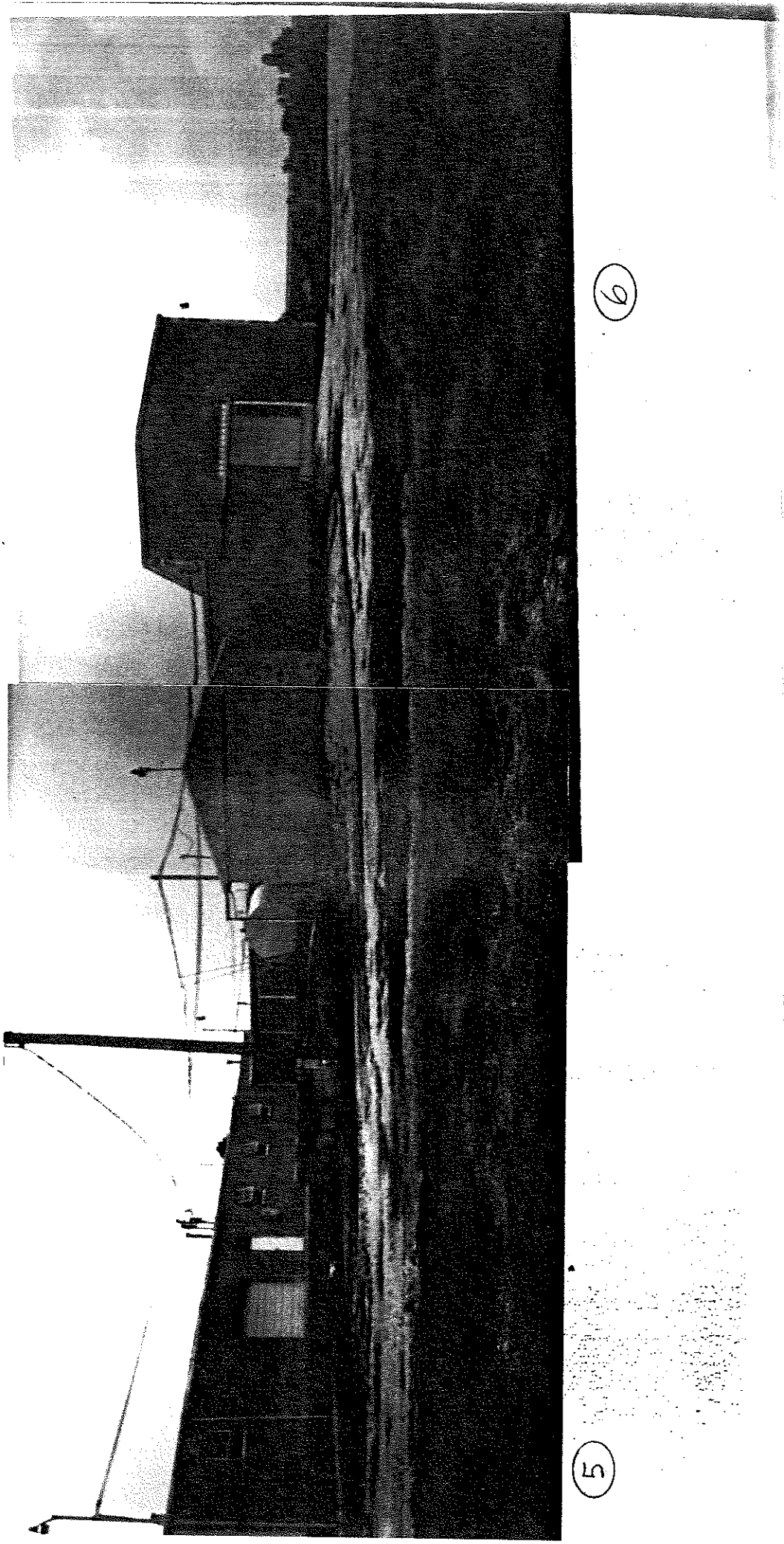
(4)

Date: August 15, 1989
Time: 2:14 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the north

Roll No. 72
Neg. No. 5

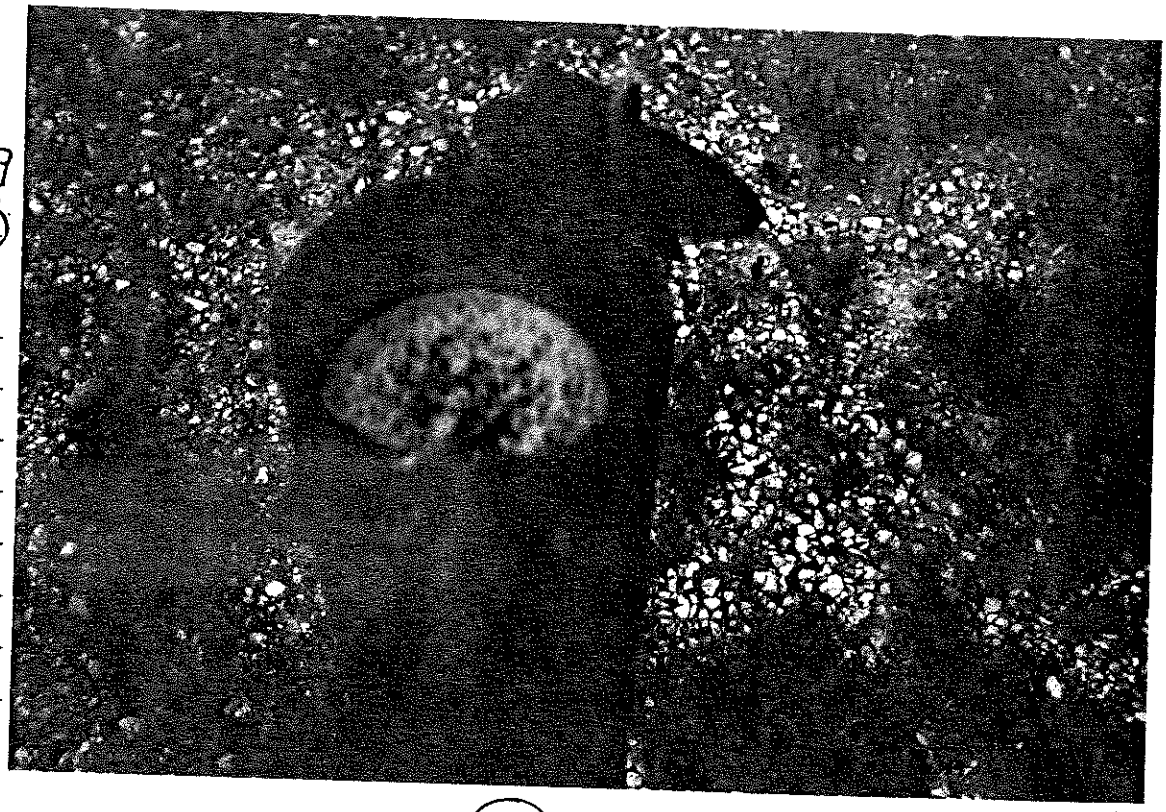
Date: August 15, 1989
Time: 2:14 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the northwest

Roll No. 72
Neg. No. 4



Date: August 15, 1989
Time: 2:16 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the northeast

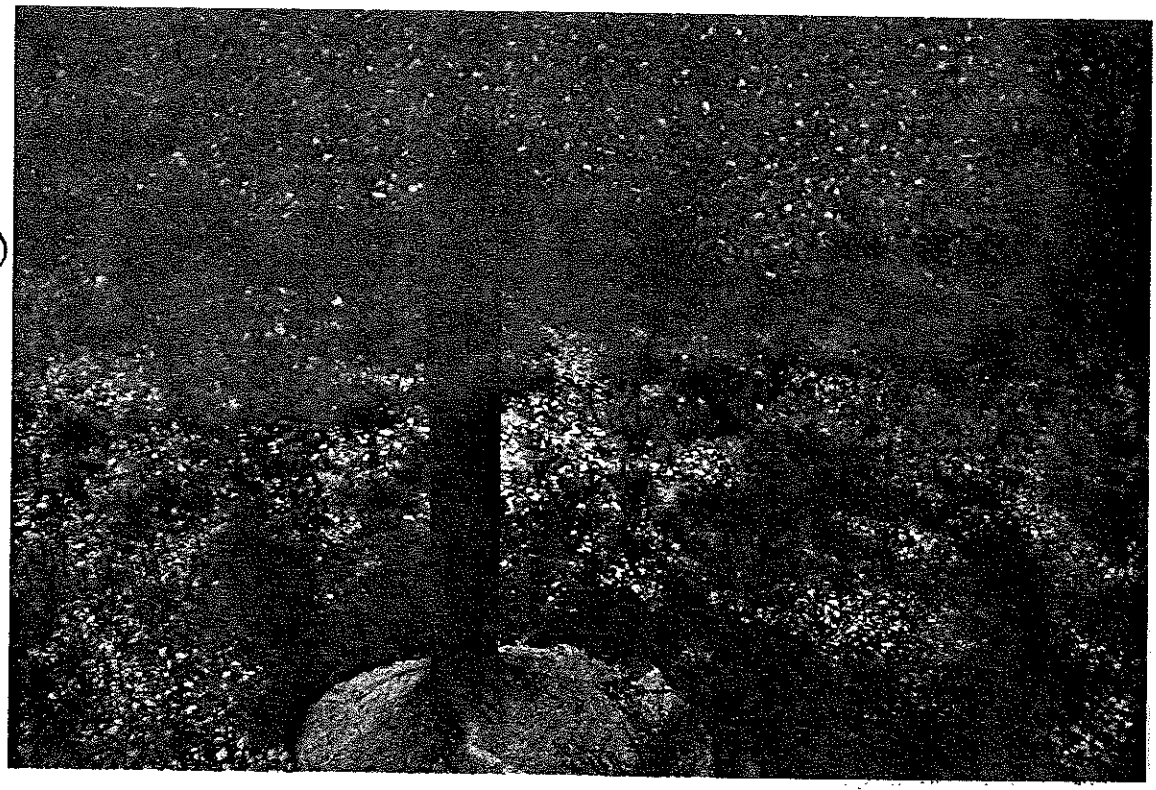
Roll No. 72
Neg. No. 6



(7)

Date: August 15, 1989
Time: 2:16 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the northeast

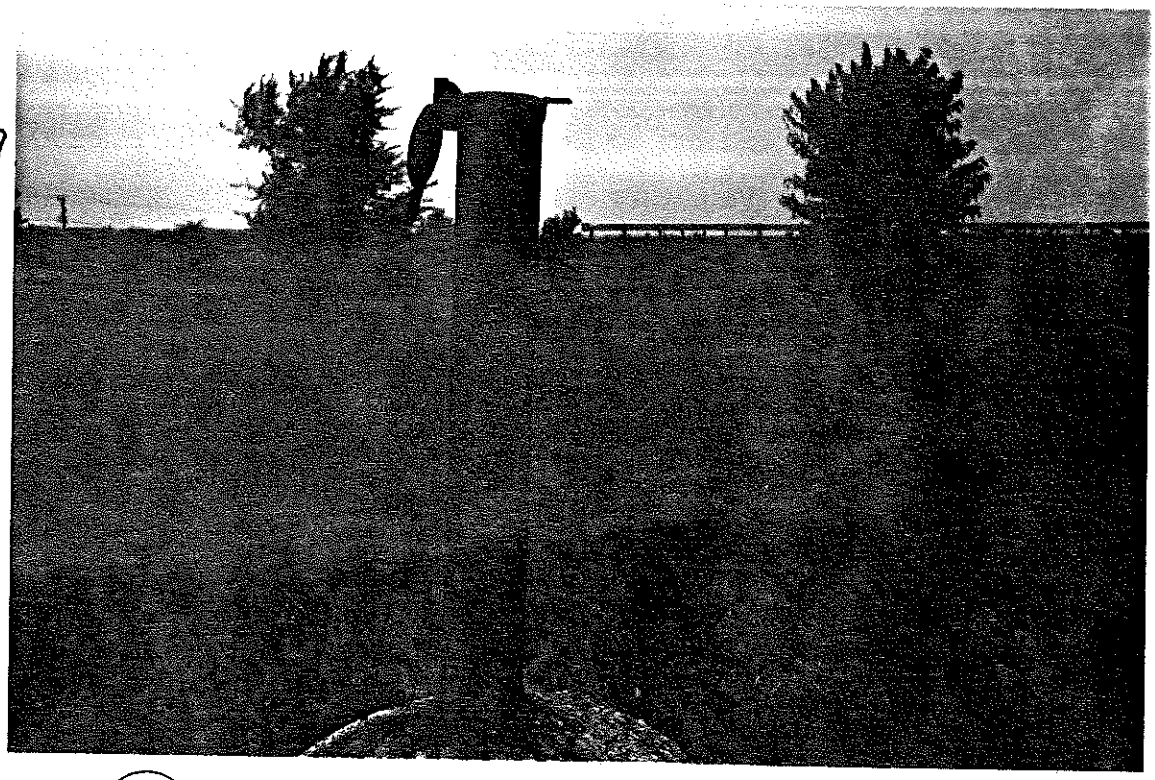
Roll No. 72
Neg. No. 7



(8)

Date: August 15, 1989
Time: 2:19 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the north

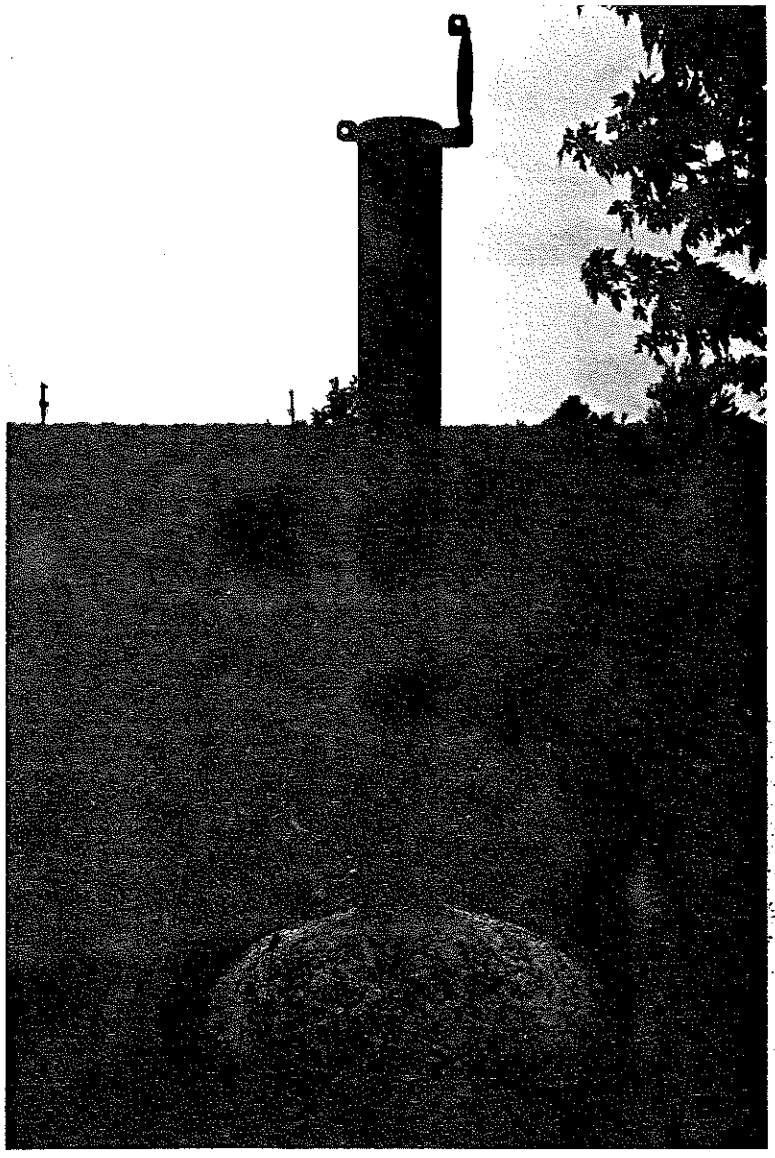
Roll No. 72
Neg. No. 8



(9)

Date: August 15, 1989
Time: 2:21 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the north

Roll No. 72
Neg. No. 9



(10)

Date: August 15, 1989

Time: 2:22 A.M. (P.M.)

Photograph By:

Karen S. Nelson

Location: LPC-0510350004

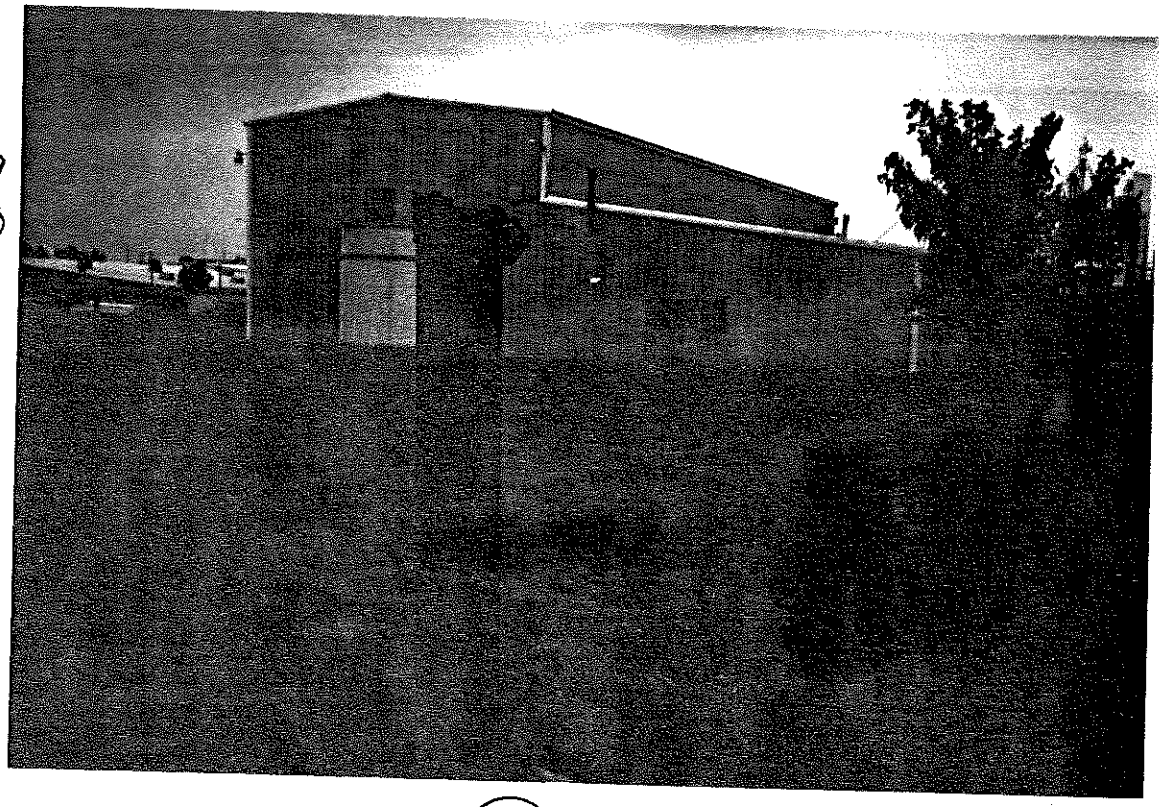
Fayette Co.

Vandalia/Van Tran

Comments: Photograph taken toward the Southeast

Roll No. 72

Neg. No. 10



(11)

Date: August 15, 1989

Time: A.M. P.M.

Photograph By:

Karen S. Nelson

Location: LPC-0510350004

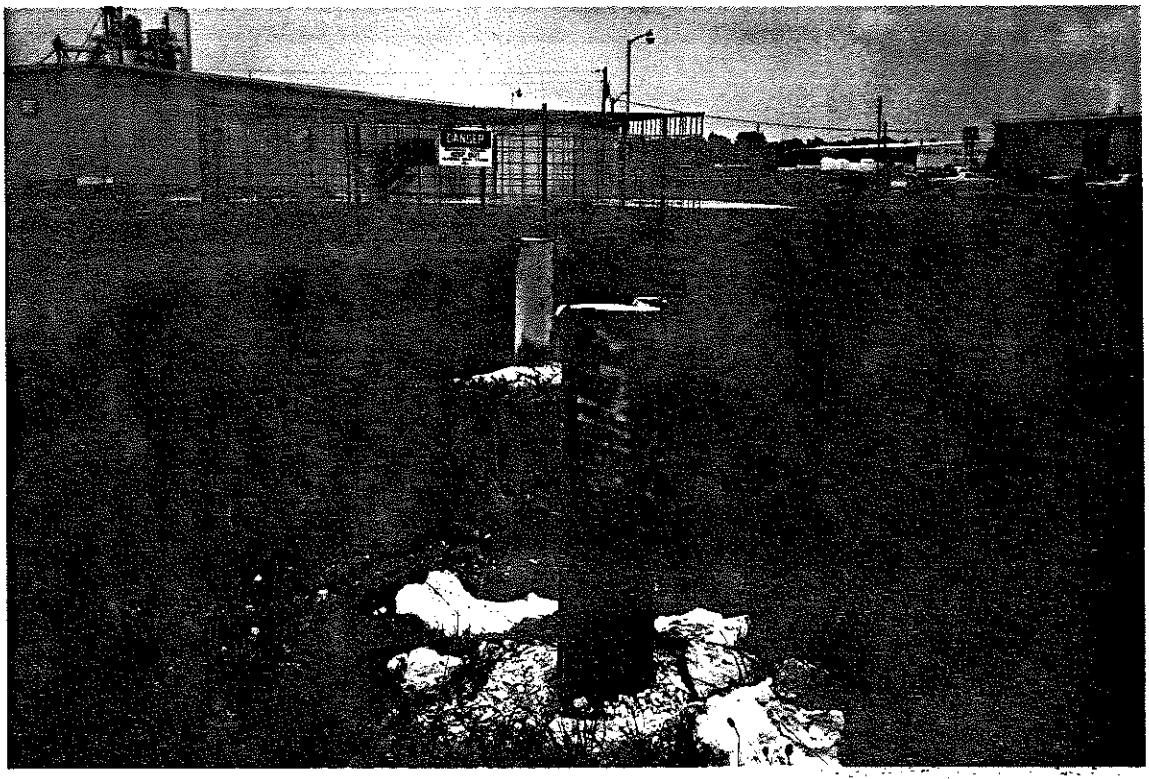
Fayette Co.

Vandalia/Van Tran

Comments: Photograph taken toward the South

Roll No. 72

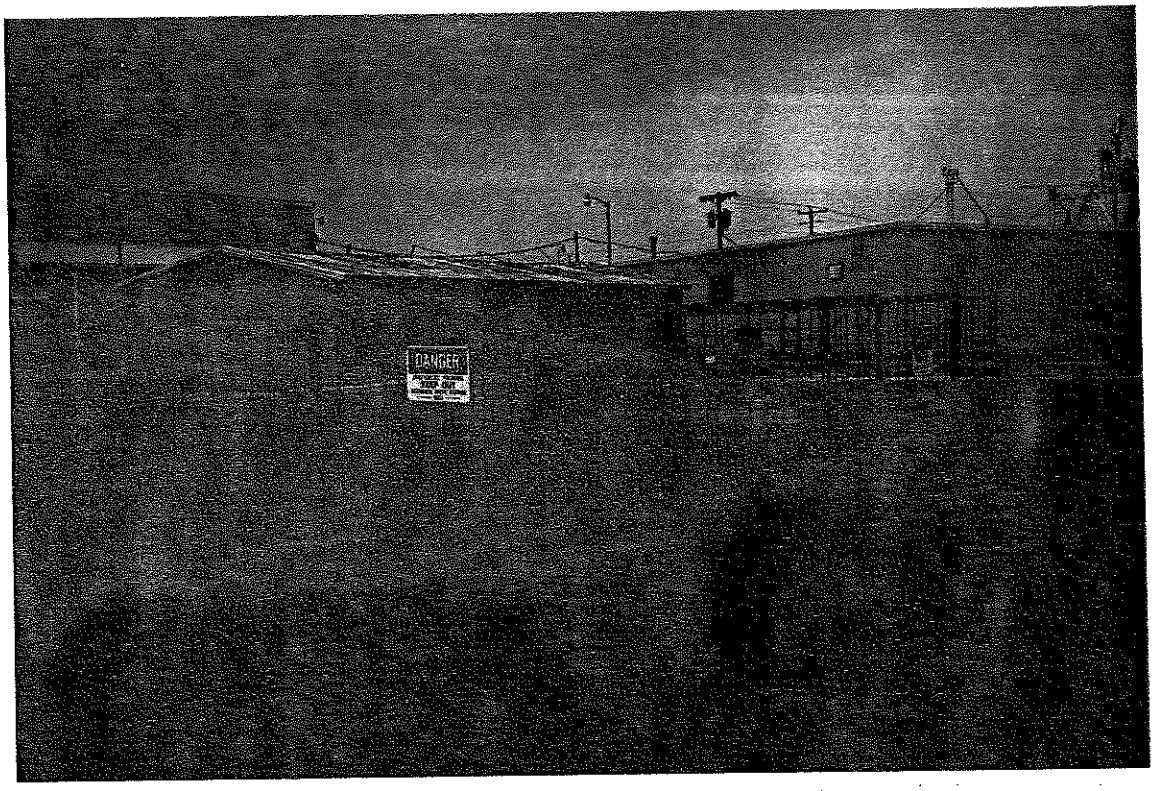
Neg. No. 11



(12)

Date: August 15, 1989
Time: 2:24 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the Southeast

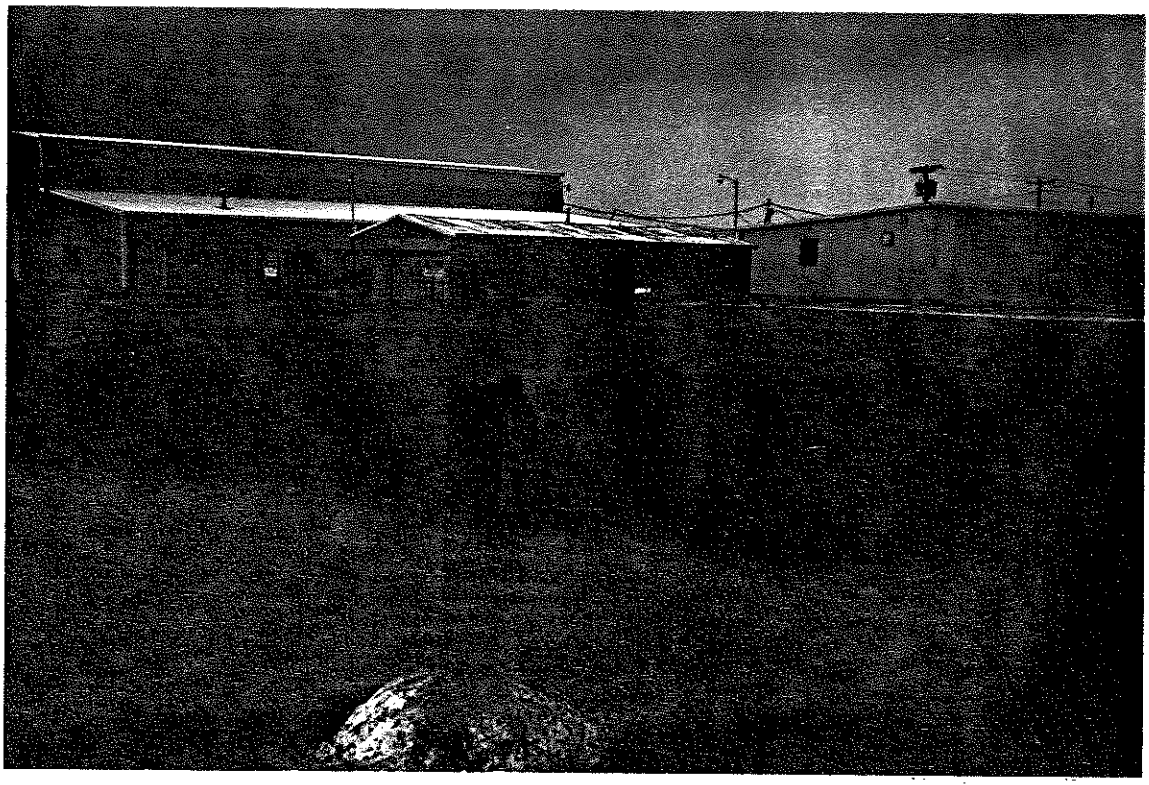
Roll No. 72
Neg. No. 12



(13)

Date: August 15, 1989
Time: 2:25 A.M. (P.M.)
Photograph By:
Karen S. Nelson
Location: LPC-0510350004
Fayette Co.
Vandalia/Van Tran
Comments: Photograph taken
toward the Southeast

Roll No. 72
Neg. No. 12a



(14)

INSPECTION REPORT

USEPA Number: IND981093628 IEPA Number: 0510350004

Facility Name: Van Tran Electric Corp

Street: 1505 Van Tran Ave

City: Vandalia Telephone: 1/800/433346

County: Fayette State: Zip Code: 62471

Type of Facility: Notified As: Generator-2 Regulated As: Storage

LDF? yes X no __ HPV? yes X no __ 90 Day Follow-up Required? yes __ no X

Region: 6 Date of Inspection: 6/23/89 From: 8:25 to 8:45

Weather (LDF Only): 80° Clear, dry

Type of Inspection

ISS: X Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __

Record Review: __ Follow-up to Inspection of _____: __ Other: __

Non Regulated Status

Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, 9/24/85, from initial X or subsequent __ notification.

Part A date, None, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no X

Has the firm been referred to: USEPA? yes __ no X; IAG? yes X no __; County States Attorney? yes __ no X. Date of referral to USEPA: _____, IAG: 8/14/85, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

Facility Activity Summary

Activity (By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 86 87 88
504	No *	N/A	Yes	No	No - Partially removed, backfilled	No	No No No
501	No *	N/A	Yes	No	Yes	No	No No No
	* No Part A Submitted						
						RECEIVED	
						JUL 3 1989	
						IEPA/DLPC	

Operator: Van Train Electric Corp Telephone #: 1-800/433-3341

Street: 7711 Imperial Dr.

City: Waco State: TX Zip Code: 76710

Owner: Same as above Telephone #:

Street:

City: State: Zip Code:

Person Interviewed	Title	Telephone #
None		

Inspection Participants	Agency/Title	Telephone #
Wendy Schaufelberger	IEPA/EPS-DLPC	618/346-5120

Prepared By	Agency/Title	Telephone #
Wendy Schaufelberger	IEPA/EPS-DLPC	618/346-5120

Continuing Unresolved

Summary of Apparent Violations

Area	Class	Section
* OTH	I	708.150
* OTH	II	725.175
* CH/PC	I	725.212
* OTH	I	725.328

Area	Class	Section

Area	Class	Section

WASTE DISPOSITION FORM

Facility Name: VanTran Electric Corp. USEPA #: ILD981093628 IEPA #: 0510350004

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt For 8_ *	8_ *	8_ *	Amount On Site	Rate of Generation	Last Manifested Shipment	Dispsit
	Facility ceased operations in September of 1987. Equipment was dismantled and shipped offsite. Currently negotiating closure with the Agency for the drum storage areas and the surface impoundment.											

0510350004 - Fayette County
Vandalia/Van Tran
ILD981093628
FOS

REMARKS

A site inspection was conducted on June 23, 1989 at the former Van Tran Electric Corporation site. Currently, the site is unoccupied and for sale. Operations were discontinued at this facility in September of 1987. The equipment was dismantled and shipped to two other Van Tran facilities. The facility was involved in the manufacture of 5-5000 KV transformers and also operated a warranty repair shop for the transformers. Arrangements were made to obtain a key for the facility from a neighboring business. No representatives of Van Tran were available during the inspection.

Negotiations concerning the closure and clean up of the site are currently being conducted between the Agency and the facility. Existing units at the site include a former surface impoundment (S04) and a drum storage building (S01).

The surface impoundment was used for the disposal of paints and solvents. PCB's were also detected. The impoundment was backfilled and now has a fence around it. It occupies an area approximately 10 ft^2. The drum storage building contains five drums of soil from the impoundment, five gallons of spent solvent, and five gallons of filter media. Twelve drums generated during the site investigation conducted in 1987 by Baker, TSA and Envirodyne, containing rinsewater used for decontamination and six additional drums generated during the installation of two groundwater monitoring wells were also located inside the building.

The building had signs posted on the outside indicating the presence of hazardous waste. The containers inside were in good condition and no sign of leakage was observed. Observation of the monitoring wells revealed them to be locked and intact.

Since the facility is shut down and closed, an ISS checklist was not completed as training, emergency procedures, and operating requirements are no longer applicable. The following apparent continuing violations were observed:

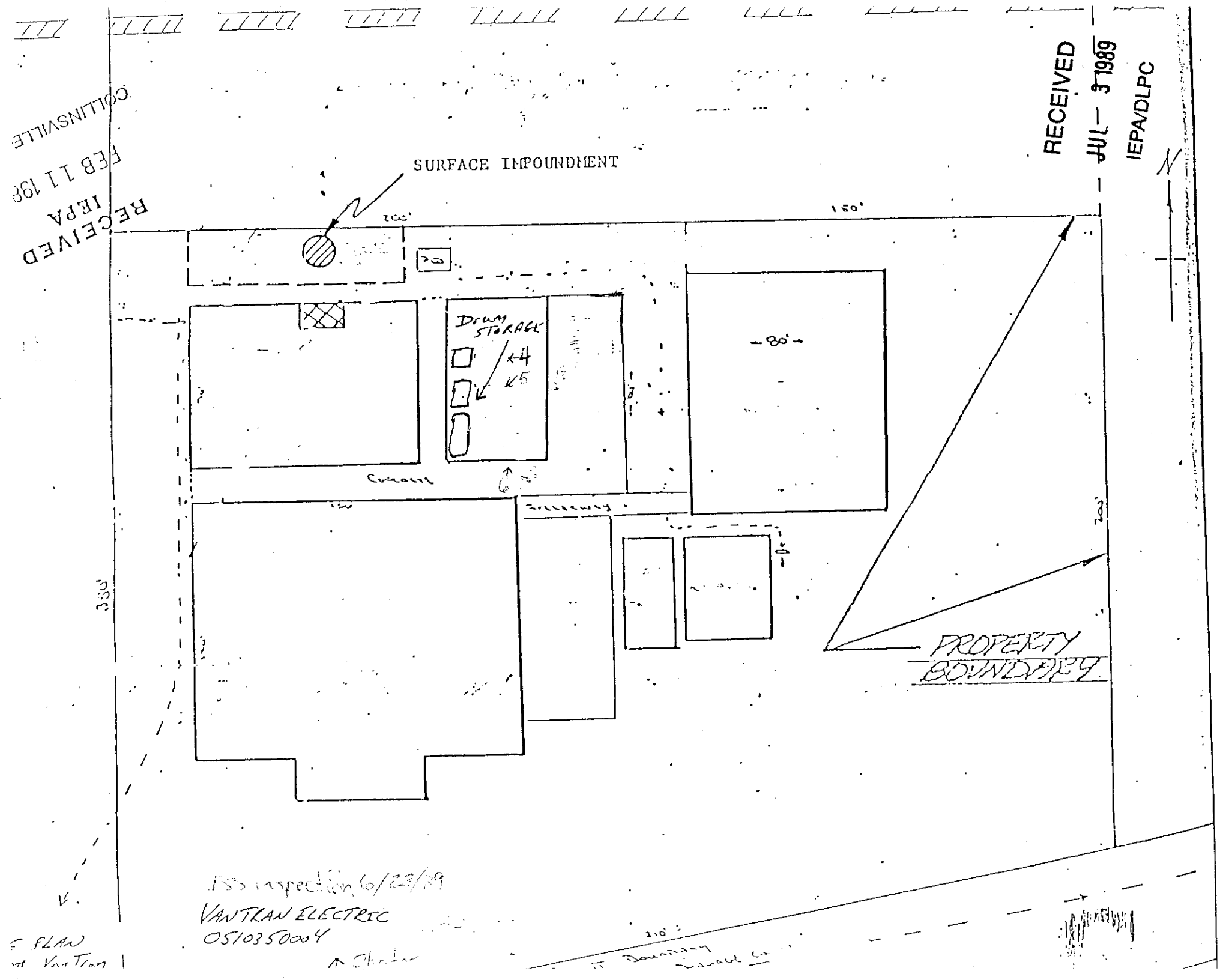
703.150 - Failure to submit Part A of the permit application.

725.175 - An annual report which includes all the TSD activities for 1987 and 1988 was not submitted.

725.212 - A closure plan for the surface impoundments and drum storage areas was not available at the facility.

725.328 - Failure to remove all waste and contaminated soil from the surface impoundment as required.

WGS:jlr:0377L



ISS inspection 6/23/89

VANTRAN ELECTRIC

0510350004

DATE: June 23, 1989

TIME: 8:25 a.m.

I.D. 0510350004 FOS

Fayette County

Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

Southwest

ROLL# 1092 PHOTO# 5

PHOTOGRAPH BY:

Wendy Schmidtknecht

DATE: June 23, 1989

TIME: 8:25 a.m.

I.D. 0510350004 FOS

Fayette County

Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 1092 PHOTO# 4

PHOTOGRAPH BY:

Wendy Schmidtknecht

WGS:jlr

RECEIVED

JUL 3 1989

IEPA/DLPC

IL 532-0603

DATE: June 23, 1989

TIME: 8:30 a.m.

I.D. 0510350004 FOS

Fayette County

Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 1092 PHOTO# 6

PHOTOGRAPH BY:

DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

WGS:jlr

F,O.S.

RCRA LAND DISPOSAL RESTRICTION INSPECTION

Facility: Van Tran Electric Corp.

U.S. EPA I.D. No.: ILD981093628 (IL# 0510350004)

Street: 1505 Van Tran Ave

City: Vandalia **State:** Il **Zip Code:** 62471

Telephone: 1-800-433-3346

Operator: Van Tran Electric Corp.

Street: 7711 Imperial Dr.

City: Waco **State:** TX **Zip Code:** 76710

Telephone: 1-800-433-3346 (contact: Steve Parke)

Owner: Same as Above

Street:

City: **State:** **Zip Code:**

Telephone:

Inspection Date: 6/23/89 **Time:** 8:25-8:45 **Weather Conditions:** 80° Clear, dry

	Name	Affiliation	Telephone
Inspectors:	Wendy Schaufelberger	IEPA	618/346-5120

Facility Representatives: None at the site

	RCRA Status	F-Solvent	LDR Status California List	First Third
Generator				
Transporter				
Treater				
Storer		X		
Disposer				

RECEIVED
JUL 3 1989
IEPA/DLPC

Revised 9-26-88

0510350004 - Fayette County
Vandalia/Van Tran
ILD981093628
FOS

REMARKS

A site inspection was conducted on June 23, 1989 at the former Van Tran Electric Corporation site. Currently, the site is unoccupied and for sale. Operations were discontinued at this facility in September of 1987. The equipment was dismantled and shipped to two other Van Tran facilities. The facility was involved in the manufacture of 5-5000 KV transformers and also operated a warranty repair shop for the transformers. Arrangements were made to obtain a key for the facility from a neighboring business. No representatives of Van Tran were available during the inspection.

Negotiations concerning the closure and clean up of the site are currently being conducted between the Agency and the facility. Existing units at the site include a former surface impoundment (S04) and a drum storage building (S01).

The surface impoundment was used for the disposal of paints and solvents. PCB's were also detected. The impoundment was backfilled and now has a fence around it. It occupies an area approximately 10 ft^2. The drum storage building contains five drums of soil from the impoundment, five gallons of spent solvent, and five gallons of filter media. Twelve drums generated during the site investigation conducted in 1987 by Baker, TSA and Envirodyne, containing rinsewater used for decontamination and six additional drums generated during the installation of two groundwater monitoring wells were also located inside the building.

The building had signs posted on the outside indicating the presence of hazardous waste. The containers inside were in good condition and no sign of leakage was observed. Observation of the monitoring wells revealed them to be locked and intact.

Since the facility is shut down and closed, an ISS checklist was not completed as training, emergency procedures, and operating requirements are no longer applicable. The following apparent continuing violations were observed:

703.150 - Failure to submit Part A of the permit application.

725.175 - An annual report which includes all the TSD activities for 1987 and 1988 was not submitted.

725.212 - A closure plan for the surface impoundments and drum storage areas was not available at the facility.

725.328 - Failure to remove all waste and contaminated soil from the surface impoundment as required.

WGS:jlr:0377L

RCRA LAND DISPOSAL RESTRICTION INSPECTION

APPLICABILITY CHECKLIST

Does the facility handle the following wastes?

		Gen.	Treat	Store	Disp.	Trans.
A.	**F-Solvent Wastes**					
1.	F001	____	____	____	____	____
2.	F002	____	____	____	____	____
3.	F003	____	____	X	____	____
4.	F004	____	____	____	____	____
5.	F005	____	____	X	____	____

Note: Use Appendix A to determine whether the facility is misclassifying any of its wastes.

B. **California List Wastes**

1. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains the following metals at concentrations greater than or equal to those specified

		Gen.	Treat	Store	Disp.	Trans.
Arsenic	500 mg/L	____	____	____	____	____
Cadmium	100 mg/L	____	____	____	____	____
Chromium VI	500 mg/L	____	____	____	____	____
Lead	500 mg/L	____	____	____	____	____
Mercury	20 mg/L	____	____	____	____	____
Nickel	134 mg/L	____	____	____	____	____
Selenium	100 mg/L	____	____	____	____	____
Thallium	130 mg/L	____	____	____	____	____

2. Liquid hazardous waste (including free liquids associated with any solid or sludge) that contains free cyanides at concentrations greater than or equal to 1,000 mg/L

Gen.	Treat	Store	Disp.	Trans.
____	____	____	____	____

3. Liquid hazardous waste that has a pH of less than or equal to 2.0

____	____	____	____	____

4. Liquid hazardous waste that contains PCBs at concentrations greater than or equal to

50 ppm	____	____	____	____	____
500 ppm	____	____	____	____	____

Does the facility mix liquid hazardous waste that contains PCBs with other types of wastes?

____ Yes ____ No ____ NA

If yes, state reasons for mixing:

_____

_____

5. Hazardous waste that contains HOCs greater than or equal to 1,000 mg/L (liquids) or 1,000 mg/kg (solids)

____	____	____	____	____

Note (1): The prohibitions of 268.32(a)(3) and (e) do not apply if the waste is also subject to the solvent restrictions of 268 Subpart C for a specific HOC.

Note (2): The effective date of regulation for liquid wastes with HOCs greater than or equal to 1,000 mg/L and less than 10,000 mg/L was July 8, 1987; the effective date for liquid wastes containing HOCs greater than or equal to 10,000 mg/L and solid wastes containing HOCs greater than 1,000 mg/kg is November 8, 1988.

C. First Third Wastes

Note: (1) The detailed description for waste codes are listed in Appendix C.
(2) EPA has promulgated the treatment standards for the following waste code with *.

	Gen.	Treat	Store	Disp.	Trans.
F006*	____	____	____	____	____
F007	____	____	____	____	____
F008	____	____	____	____	____
F009	____	____	____	____	____
F019	____	____	____	____	____
K001*	____	____	____	____	____
K004*	____	____	____	____	____
K008*	____	____	____	____	____
K011	____	____	____	____	____
K013	____	____	____	____	____
K014	____	____	____	____	____
K015*	____	____	____	____	____
K016*	____	____	____	____	____
K017	____	____	____	____	____
K018*	____	____	____	____	____
K019*	____	____	____	____	____
K020*	____	____	____	____	____
K021*	____	____	____	____	____
K022*	____	____	____	____	____
K024*	____	____	____	____	____
K025*	____	____	____	____	____
K030*	____	____	____	____	____
K031	____	____	____	____	____
K035	____	____	____	____	____
K036*	____	____	____	____	____
K037*	____	____	____	____	____
K044*	____	____	____	____	____
K045*	____	____	____	____	____
K046*	____	____	____	____	____

	Gen.	Treat	Store	Disp.	APP Trans.
K047*					
K048*					
K049*					
K050*					
K051*					
K052*					
K060*					
K061*					
K062*					
K069*					
K071*					
K073*					
K083*					
K084					
K085					
K086*					
K087*					
K099*					
K100*					
K101*					
K102*					
K103*					
K104*					
K106*					
P001					
P004					
P005					
P010					
P011					
P012					
P015					
P016					
P018					

	Gen.	Treat	Store	Disp.	APP Trans.
P020					
P030					
P036					
P037					
P039					
P041					
P048					
P050					
P058					
P059					
P063					
P068					
P069					
P070					
P071					
P081					
P082					
P084					
P087					
P089					
P092					
P094					
P097					
P102					
P105					
P108					
P110					
P115					
P120					
P122					
P123					
U007					
U009					

	Gen.	Treat	Store	Disp.	APP Trans.
U010					
U012					
U016					
U018					
U019					
U022					
U029					
U031					
U036					
U037					
U041					
U043					
U044					
U046					
U050					
U051					
U053					
U061					
U063					
U064					
U066					
U067					
U074					
U077					
U078					
U086					
U089					
U103					
U105					
U108					
U115					
U122					
U124					

	Gen.	Treat	Store	Disp.	APP Trans.
U129					
U130					
U133					
U134					
U137					
U151					
U154					
U155					
U157					
U158					
U159					
U171					
U177					
U180					
U185					
U188					
U192					
U200					
U209					
U210					
U211					
U219					
U220					
U221					
U223					
U226					
U227					
U228					
U237					
U238					
U248					
U249					

RCRA LAND DISPOSAL RESTRICTION INSPECTION

GENERATOR CHECKLIST

GENERATOR REQUIREMENTS

A. **BDAT Treatability Group - Treatment Standards Identification**

This section is not applicable as the facility has not been in operation since September of 1987 See Remarks

1. F-Solvent Wastes: Does the generator correctly determine the appropriate treatability group of the waste?

   ____ Yes ____ No ____ NA

   If yes, check the appropriate treatability group.

   ___ Wastewaters containing solvents (less than or equal to 1% TOC by weight)
   ___ Pharmaceutical wastewater containing spent methylene chloride
   ___ All other spent solvent wastes

2. California List Wastes: Does the generator correctly determine the appropriate treatment standard of the waste?

   a. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 50 but less 500 ppm, is the treatment in accordance with existing TSCA thermal treatment regulations for burning in high efficiency boilers (40 CFR 761.60) or incineration (40 CFR 761.70)?

      ____ Yes ____ No ____ NA

      If yes, specify the method: _____

   b. For liquid hazardous waste that contains PCBs at concentrations greater than or equal to 500 ppm, is the waste incinerated or disposed of by other approved alternate methods (40 CFR 761. 60 (e))?

      ____ Yes ____ No ____ NA

      If yes, specify the method and state whether the facility has submitted a written request to the Regional Administrator or Assistant Administrator for an exemption from the incineration requirement:

      _____
      _____
      _____

RCRA LAND DISPOSAL RESTRICTION INSPECTION

TSD CHECKLIST

TSD REQUIREMENTS

A. General Facility Standards

1. Does the waste analysis plan cover Part 268 requirements [264.13 or 265.13]?

   o F-solvent ____ Yes ____ No __X__ NA

   o California List ____ Yes ____ No __X__ NA

   o First Third ____ Yes ____ No __X__ NA

Facility is no longer in operation, however Containers of Solvent and drums of Solvent Contaminated Soil are stored on site.

2. Does the facility obtain representative chemical and physical analyses of wastes and residues?

   ____ Yes ____ No

NA See Remarks

   a. What date was the waste analysis plan last revised? _____

   b. Are analyses conducted on-site or off-site?

      ____ On-site ____ Off-site

      Identify off-site lab: _____

   c. Is F-solvent waste analyzed using TCLP?

      ____ Yes ____ No ____ NA

   d. Is First Third waste analyzed using the analytical method that is appropriate for the objective of the specified BDAT (i.e., total constituent analysis for destruction technologies and TCLP for stabilization/fixation technologies)?

      ____ Yes ____ No ____ NA

      Note: The appropriate analytical methods (TCLP or total constituent) for first third wastes with specified treatment standards are given in Appendix D.

   e. Describe the frequency of sampling: _____

3. Are the operating records, including analyses and quantities, complete [264.73/265.73]?

____ Yes ____ No

B. Storage (268.50)

1. Are restricted wastes stored on-site?

X Yes ____ No

The facility also operated a surface impoundment which was partially excavated and backfilled. Contents is still present and it is currently regulated as 504

If no, go to C, Treatment.

2. If yes, check the appropriate method.

____ Tanks
X Containers

3. Are all containers clearly marked to identify the contents and date(s) entering storage?

X Yes ____ No ____ NA

4. Do operating records track the location, quantity of the wastes, and dates that the wastes enter and leave storage?

____ Yes ____ No

NA See Remarks

5. Do operating records agree with container labeling?

____ Yes ____ No ____ NA

6. Do operating records contain copies of the notice, certification, and demonstration (if applicable) from the generator for the past 5 years?

____ Yes ____ No

7. Have wastes been stored for more than 1 year since the applicable LDR regulations went into effect?

X Yes ____ No ____ NA

If yes, can the facility show that such accumulation is necessary to facilitate proper recovery, treatment, or disposal?

____ Yes X No

If yes, state how: _____

8. Have tanks been emptied at least once per year since the applicable LDR regulations went into effect?

____ Yes ____ No X NA

If yes, do the operating records show that the volume of waste removed from tanks annually equals or is more than the tank volume?

____ Yes ____ No

9. Are all tanks clearly marked with a description of the contents, the quantity of wastes received, and date(s) entering storage, or is such information recorded and maintained in the operating record?

____ Yes ____ No X NA

C. **Treatment** No treatment being conducted

1. Does the facility treat restricted wastes other than in surface impoundments?

____ Yes ____ No

If no, go to D, Treatment in Surface Impoundments.

2. Describe the treatment processes:

_____

_____

_____

3. Does the facility, in accordance with an acceptable waste analysis plan, determine whether the residue or residue extract (for treatment standards expressed as concentrations in the waste extract) from all treatment processes is less than treatment standards [268.7(b)]?

_____ Yes _____ No

4. Is dilution used as a substitute for treatment?

_____ Yes _____ No

6. Are notifications, demonstration, and certification (if applicable) prepared by the generators kept in the facility's operating record?

_____ Yes _____ No

7. Does the facility ship any waste or treatment residue that meets the treatment standards to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility provide notification and certification to the disposal facility?

_____ Yes _____ No

If yes, does notification contain the following?

EPA Hazardous waste number(s)	_____ Yes	_____ No
Applicable treatment standards	_____ Yes	_____ No
Manifest number	_____ Yes	_____ No
Waste analysis data, if available	_____ Yes	_____ No
Certification that the waste meets the treatment standards	_____ Yes	_____ No

Identify off-site disposal facilities: _____

_____

_____

8. Does the facility ship any "soft hammer" waste to an off-site disposal facility?

_____ Yes _____ No _____ NA

If yes, does the treatment facility send a copy of the generator's demonstration (if applicable) and certification to the disposal facility?

_____ Yes _____ No

D. <u>Treatment in Surface Impoundments</u>

1. Are restricted wastes placed in surface impoundments for treatment?

_____ Yes _____ No

If no, go to E, Land Disposal.

2. If yes, did the facility submit to the Agency the waste analysis plan and certification of compliance with minimum technology and ground-water monitoring requirements?

_____ Yes _____ No

3. If the minimum technology requirements have not been met, has a waiver been granted for that unit?

_____ Yes _____ No _____ NA

4. Are representative samples of the sludge and supernatant from the surface impoundment tested separately, acceptably, and in accordance with the sampling frequency and analysis specified in the waste analysis plan?

_____ Yes _____ No

Attach test results.

5. Do the hazardous waste residues (sludges or liquids) exceed the treatment standards specified in 268.41, or where no treatment standards are established for a waste, the applicable prohibition levels?

_____ Yes _____ No

6. Provide the frequency of analyses conducted on treatment residues: _____

_____

_____

7. Does the operating record adequately document the results of waste analyses performed in accordance with 268.41?

_____ Yes _____ No

8. Do the hazardous waste residues exceed the treatment standards (268.41) or do not meet the prohibition levels?

Sludge _____ Yes _____ No

Supernatant _____ Yes _____ No

a. If yes, are sludge and supernatant removed adequately on an annual basis?

_____ Yes _____ No

b. Are adequate precautions taken to protect liners, and do records indicate that liner integrity is inspected?

_____ Yes _____ No

c. Are residues subsequently managed in another surface impoundment?

_____ Yes _____ No

d. Are residues treated prior to disposal?

_____ Yes _____ No

If yes, are waste residues treated on-site or off-site?

_____ On-site _____ Off-site

Identify treatment method: _____

_____

_____

E. Land Disposal

1. Are restricted wastes placed in land disposal units such as landfills, surface impoundments, waste piles, wells, land treatment units, salt domes/beds, mines/caves, or concrete vault or bunker?

_____ Yes _____ No

Note: Do not include surface impoundments addressed in D, Treatment in Surface Impoundments.

If yes, specify which units and what wastes each unit has received: _____

_____

2. Are these wastes disposed of in a new, replacement, or laterally expanded landfill or impoundment that meets the minimum technology requirements (double liner and leachate collection) and groundwater monitoring?

_____ Yes _____ No

3. Does the facility operating record have notices, certifications, and demonstration (if applicable) from generators/storer/treaters for 5 years [268.7(c); 268.7(a),(b)]?

_____ Yes _____ No

4. Does the facility obtain waste analysis data or test the wastes (according to the waste analysis plan) to determine that the wastes comply with the applicable treatment standards [268.7(c)]?

_____ Yes _____ No

If yes, at what frequency? _____

_____

5. If restricted wastes that exceed the treatment standards are placed in land disposal units (excluding national capacity variances) [268.30(a)], does facility have an approved waiver based on no migration petition [268.6], an approved case-by-case capacity extension [268.5], or variance [268.44]?

_____ Yes _____ No

6. Does the facility dispose of restricted wastes that are subject to a national capacity variance?

_____ Yes _____ No

7. Does the facility have notices [268.7(a)(3)] and records of disposal for disposed wastes that are subject to a national capacity variance, case-by-case extensions [268.5], or no migration petitions [268.6]?

____ Yes ____ No ____ NA

8. What is the volume of the restricted wastes disposed of to date?

_____

_____

9. If the facility has a case-by-case extension, is the facility making progress as described in progress reports?

____ Yes ____ No ____ NA

INSPECTION REPORT

USEPA Number: ILD981093628 IEPA Number: 0510350004

Facility Name: Van Tran Electric Corp

Street: 1505 Van Tran Avenue

City: Vandalia Telephone: 618/283-3220

County: Fayette State: Ill. Zip Code: 62471

Type of Facility: Notified As: Generator 2 Regulated As: Storage

LDF? yes ✓ no __ HPV? yes ✓ no __ 90 Day Follow-up Required? yes __ no ✓

Region: 6 Date of Inspection: July 12, 1988 From: 9:20 to 1:30

Weather (LDF Only): Overcast, 85°

Type of Inspection

ISS: X Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __

Record Review: __ Follow-up to Inspection of ________: __ Other: __

Non Regulated Status

Small Quant. Gen:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, 9/24/85, from initial X or subsequent __ notification.

Part A date, NONE, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no X

Has the firm been referred to: USEPA? yes __ no X; IAG? yes X no __; County States Attorney? yes __ no X. Date of referral to USEPA: ________, IAG: 8/14/85, County States Attorney: ________.

Federal Court Order Issued: ________ State Court Order Issued: ________

USEPA Compliance Order Issued: ________ Illinois PCB Order Issued: ________

TSD Facility Activity Summary

Activity (By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 85	86	87
504	No	N/A	Yes	No	No - Partially Removed + Backfilled	No	No	No	No
501	No	N/A	Yes	No	Yes	No	No	No	No

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JUL 22 1988

IEPA-DLPC

Operator: Van Tran Electric Corp Telephone #: 817/772-9746

Street: 7711 Imperial Drive

y: Waco State: Tx Zip Code: 76710

Owner: Van Tran Electric Corp Telephone #: 817/772-9746

Street: 7711 Imperial Drive

City: Waco State: TX Zip Code: 76710

Person Interviewed	Title	Telephone #
Rick Christensen	Hydrogeologist/Baker/ISA	219/736-0263

Inspection Participants	Agency/Title	Telephone #
Jonathon Adenuga	USEPA-Region II	312/886-7954
Chuck Reeter	IEPA/DLPC-EPS	618/345-4606
Mike Grant	IEPA/DLPC-EPS	618/345-4606

Prepared By	Agency/Title	Telephone #
Mike Grant	IEPA/DLPC-EPS	618/345-4606

* Continuing Unresolved

Summary of Apparent Violations

	Area	Class	Section
*	OTH	I	703.150
*	OTH	I	725.114
*	OTH	II	725.175
*	C4/PC	I	725.212
*	OTH	I	725.328

Area	Class	Section

WASTE DISP[illegible]TION FORM

Facility Name: Van Tran Electric Corp. USEPA #: ILD981093628 IEPA #: 0510350004

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt For 8_ *	8_ *	8_ *	Amount On Site	Rate of Generation	Last Manifested Shipment	Dispsiti
	Facility ceased operations											
	in September of 1987. Equipment											
	was dismantled and shipped offsite											
	Currently negotiating closure with the Agency											
	for the drums and the surface impoundment.											

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* All "no" responses must be explained [illegible]

0510350004
Fayette County - Vandalia/Van Tran
ILD981093628

REMARKS

Van Tran Electric Corporation manufactured 5 to 5000 KV transformers and also operated a warranty repair shop for their transformers. In September of 1987 the facility shut down its operations, dismantled all the equipment and shipped the equipment to the two other Van Tran facilities. The buildings are currently for sale or lease.

The facility is currently negotiating closure/clean-up of the site with the Agency. A surface impoundment which contained solvent and paint wastes and PCB's, five drums of soil from the impoundment, five gallons of spent solvent, and five gallons of filter media remain on-site. The surface impoundment was backfilled and fenced. The drums and five gallon buckets are being stored in a locked building. There are also twelve drums which were generated during the site investigation conducted in 1987 by Baker, TSA and Envirodyne. These drums contain rinse water used to decontaminate sampling gear, disposable equipment and trash, i.e., tyveks and gloves. These drums are being stored outside on concrete and beginning to show signs of weathering. Several drums are bulging on the bottoms.

At the site we were met only by Rich Christensen, Hydrogeologist for Baker, TSA and the drill rig. During our inspection, one of the two new RCRA groundwater monitoring wells was being installed. The drums in the building could not be inspected to determine their condition. Mr. Christensen did not have keys to the building. Mr. Reeter phoned Mr. Parke, Vice President to try to arrange for someone to unlock the building. However, Mr. Parke, who was called at his office in Waco, Texas was unable to grant this request.

Since the facility is shut down and closed, and ISS checklist was not completed as training, emergency procedures, and operating requirements are no longer applicable. The following apparent violations were observed:

703.150 - Failure to submit Part A of the permit application.

725.114 - Since the facility is closed, provisions to restrict access to the area where the twelve drums which are stored behind the building must be made.

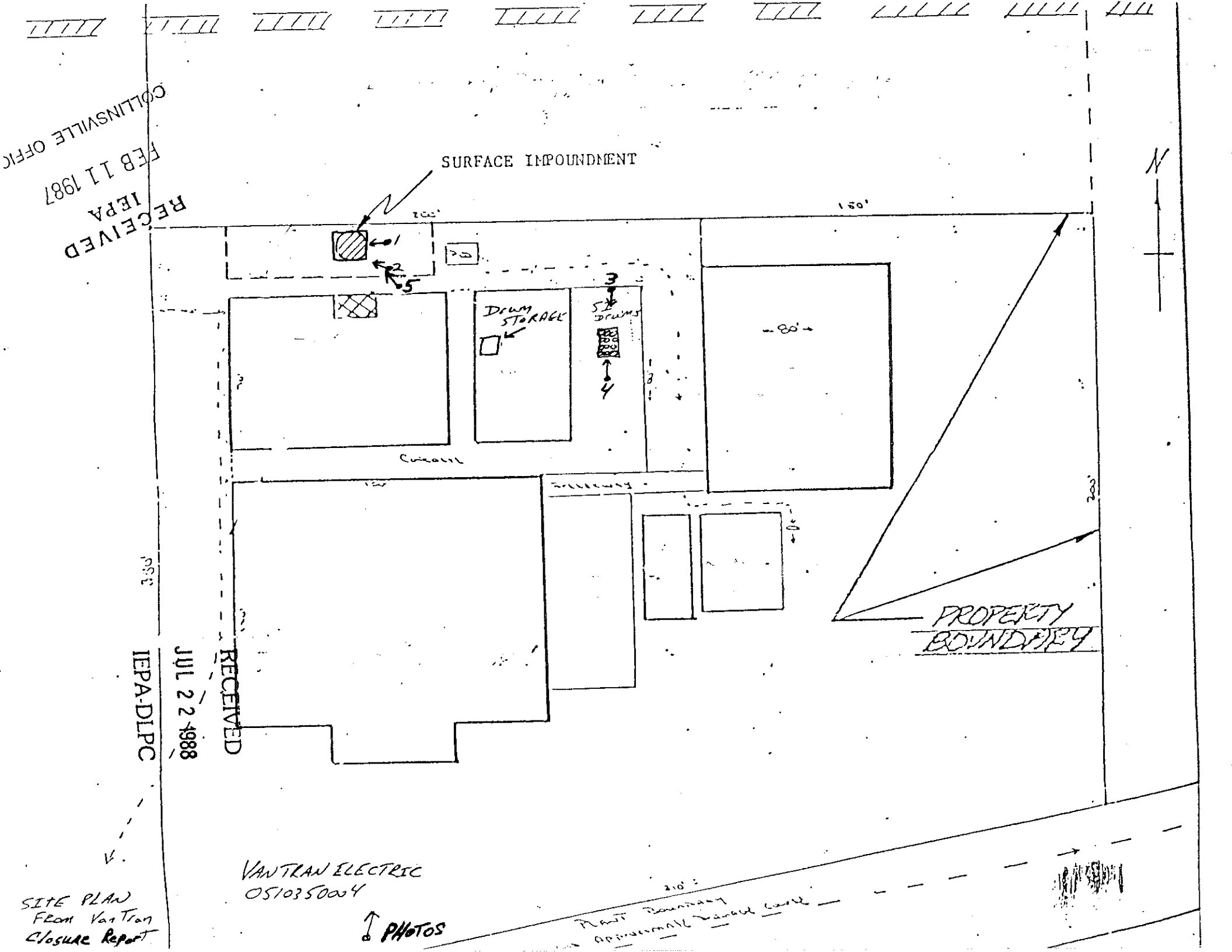
725.175 - A annual report which includes all the TSD activities for 1987 was not submitted.

725.212 - A closure plan for the surface impoundments and drum storage areas was not available at the facility.

725.328 - Failure to remove all waste and contaminated soil from the surface impoundment as required.

Since the drum storage area inside the building could not be inspected, arrangements will be made to determine the integrity of the drums at a later date.

MDG:cas/0186L
cc: DLPC - Collinsville



SITE PLAN
From VanTran
Closure Report

DATE: July 12, 1988

TIME: 9:55 a.m.

I.D. 0510350004 FOS

Fayette County

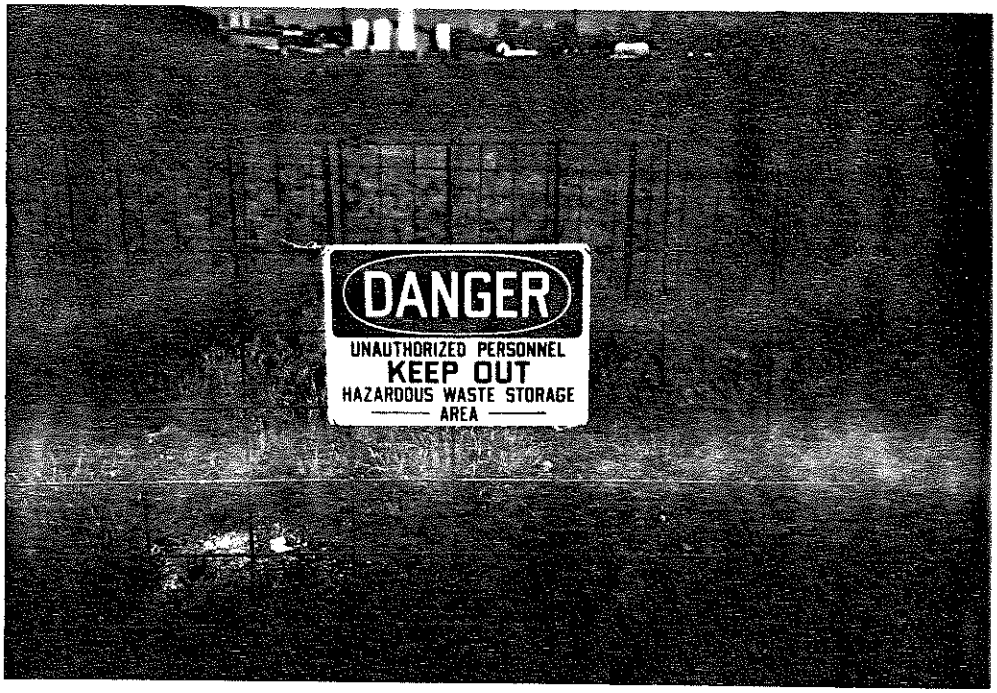
Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 892 PHOTO# 1

PHOTOGRAPH BY:



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JUL 22 1988

IEPA-DLPC

DATE: July 12, 1988

TIME: 9:55 a.m.

I.D. 0510350004 FOS

Fayette County

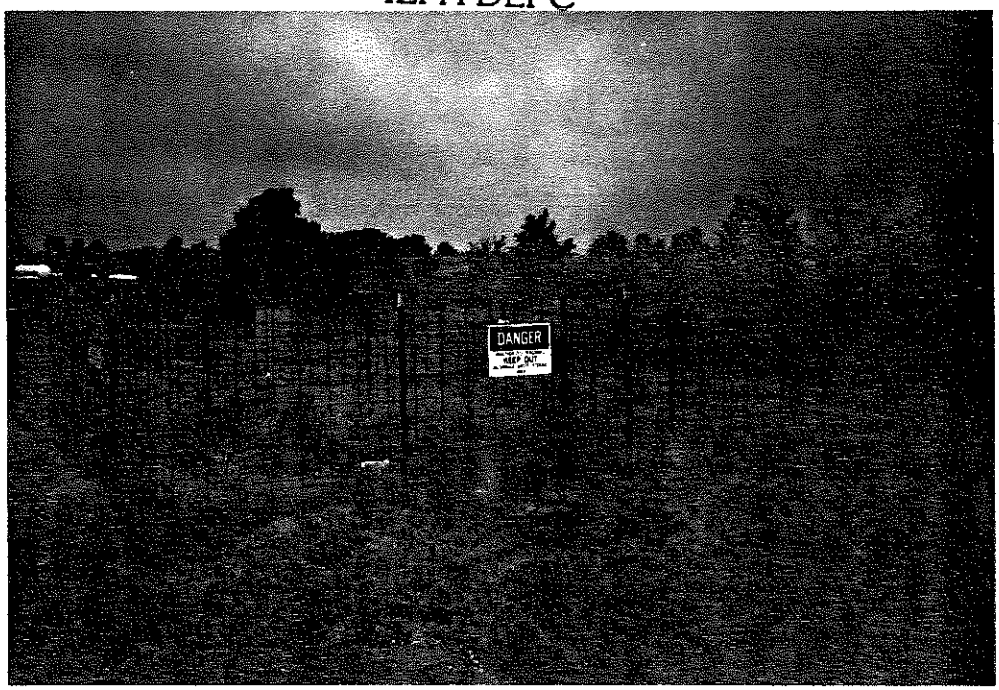
Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 892 PHOTO# 2

PHOTOGRAPH BY:



DATE: July 12, 1988

TIME: 10:00 a.m.

I.D. 0510350004 FOS

Fayette County

Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

South

ROLL# 892 PHOTO# 3

PHOTOGRAPH BY:

DATE: July 12, 1988

TIME: 10:02 a.m.

I.D. 0510350004 FOS

Fayette County

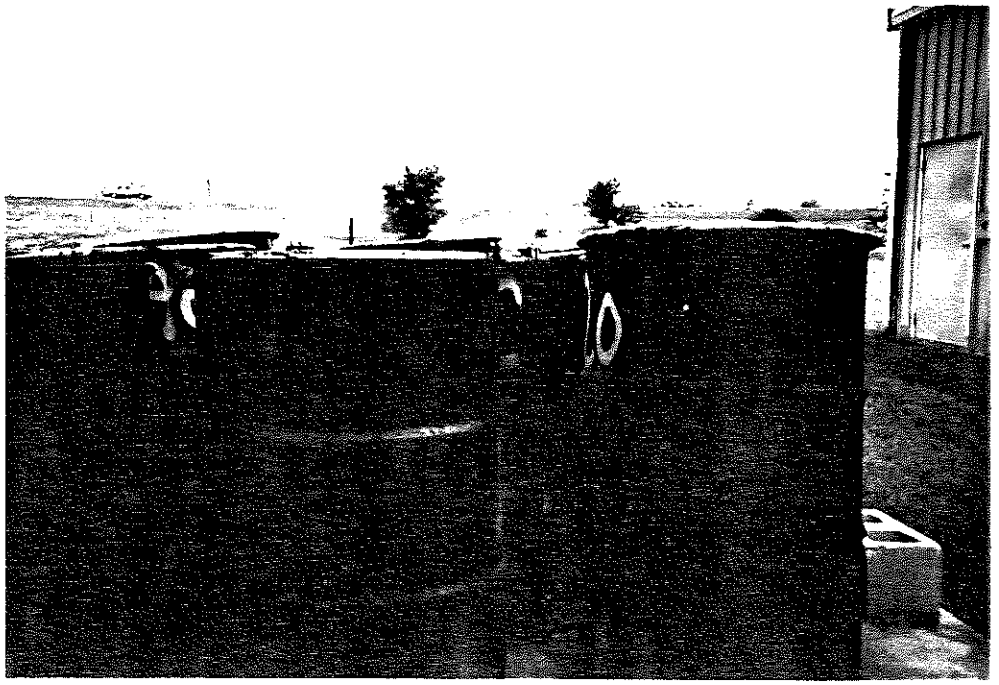
Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 892 PHOTO# 4

PHOTOGRAPH BY:



DATE: July 12, 1988

TIME: 10:48 a.m.

I.D. 0510350004 FOS

Fayette County

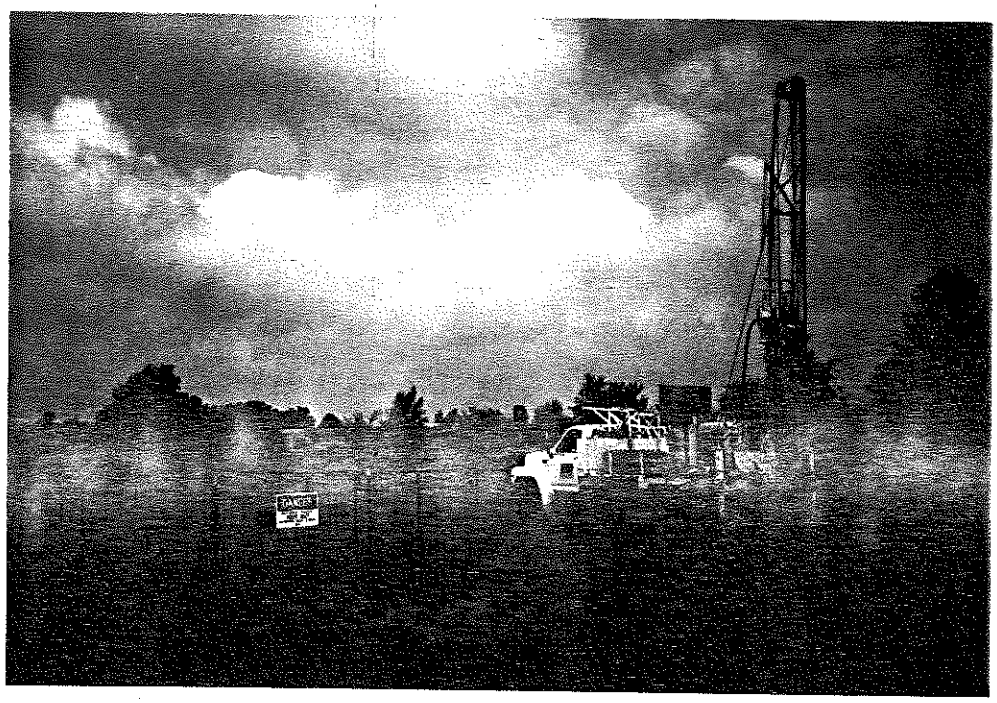
Vandalia/Van Tran Electric

PHOTOGRAPH TAKEN TOWARD THE:

Northwest

ROLL# 892 PHOTO# 5

PHOTOGRAPH BY:



DATE:

TIME:

I.D.

County

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# PHOTO#

PHOTOGRAPH BY:

RECEIVED
JUL 22 1988
IEPA-DLPC

M E M O R A N D U M

DATE: July 18, 1988

TO: LPC - Division File

FROM: Mike Grant

SUBJECT: 0510350004 - Fayette County - Vandalia/Van Tran Electric Corp.
ILD981093628
RCRA - Compliance

Compliance history of the subject facility as related to four IEPA ISS inspections conducted June 3, 1985, October 3, 1985, August 21, 1987 and July 12, 1988.

	Section	ISS Date When First Discovered	Status R = Resolved U = Unresolved	If Resolved, ISS Date When Determined
1)	703.150	06/03/85	U	-
2)	722.111	06/03/85	R	07/12/88
3)	722.112	06/03/85	R	10/03/85
4)	722.120	06/03/85	R	10/03/85
5)	722.130	06/03/85	R	10/03/85
6)	725.111	06/03/85	R	10/03/85
7)	725.113	06/03/85	R	08/21/87
8)	725.114	06/03/85	U	-
9)	725.115	06/03/85	R	07/12/88
10)	725.116	06/03/85	R	07/12/88
11)	725.117	06/03/85	R	10/03/85
12)	725.131	06/03/85	R	10/03/85
13)	725.132	06/03/85	R	10/03/85
14)	725.133	06/03/85	R	08/21/87
15)	725.134	06/03/85	R	10/03/85
16)	725.137	06/03/85	R	07/12/88
17)	725.151	06/03/85	R	08/21/87
18)	725.152	08/21/87	R	07/12/88
19)	725.155	06/03/85	R	08/21/87
20)	725.173	06/03/85	R	07/12/88
21)	725.174	06/03/85	R	10/03/85
22)	725.175	06/03/85	U	-
23)	725.212	06/03/85	U	-

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	Section	ISS Date When First Discovered	Status R = Resolved U = Unresolved	If Resolved, ISS Date When Determined
24)	725.242	06/03/85	*See Explanation	-
25)	725.274	10/03/85	R	08/21/87
26)	725.322	06/03/85	R	10/03/85
27)	725.326	06/03/85	R	10/03/85
28)	725.328	10/03/85	U	-
29)	725.329	06/03/85	R	08/21/87

* The apparent violation of Section 725.242 (Closure Cost Estimate) is no longer alleged by FOS, when the facility does not have a complete closure plan as required by Section 725.212. Whether a violation exists with Section 725.242 should be determined by the Financial Assurance Unit.

A "return to compliance letter" will be sent to the facility resolving these appropriate violations.

All remaining violations will be reported to the EDG with a request that they be referred to the AGO.

MDG:jlr/0185L

cc: Bruce Carlson
cc: Chris Nifong
cc: DLPC Collinsville

APPENDIX I
Oversight Inspection Form

Instructions:

The form is divided into two parts. Part 1 is used during the actual inspection to record observations made in the field. Part 2 of the form is used to evaluate the State inspection report relative to field observations. Both parts of the oversight inspection report have to be completed by the EPA oversight inspector. In the remarks column, N/A may be appropriate in some instances.

PART 1

I. Facility Name: VAN TRAN ELECTRIC

EPA ID #: ILD 981093628

Facility Activities:
- ____ Small Quantity Generator
- ____ Generator
- ____ Transporter
- ✓ Treatment/Storage/Disposal Facility

II. Inspection Type:
- ____ CEI
- ✓ CME
- ____ Records Review
- ____ CDI
- ____ O & M
- ____ Lab Audit
- ____ Compliance Monitoring
- ____ Other (specify) ____

Items To Be Reviewed:
- ____ Full Scope
- ✓ Limited Scope

Inspection Format:
- ✓ Joint
- ____ Independent

III. EPA Oversight Inspector: JONATHAN ADENUGA

Organization: U.S. EPA

Telephone: (312) 886-7954

IV. Inspection Date(s): 7/12/88

	Yes	No	Remarks
3. Did the inspector fail to note any violations or improper waste handling activities?		✓	
4. Did the inspector fail to identify any hazardous waste handling areas not previously identified in previous reports or records?			N/A
5. Upon identifying a potential violation, did the inspector initiate case development procedures (i.e., gather detailed evidence to support the findings of violations)?			N/A
6. Did the inspector check the requirements for preparedness and prevention, including adequate aisle space, emergency equipment availability, and access to communications during hazardous waste handling operations?			N/A
7. If applicable, was sampling performed by State personnel in accordance with standard operating procedures specified by the State and/or EPA?		✓	
8. Was proper safety and sampling equipment used to perform the sampling?			N/A
9. Was the inspector helpful to the owner/operator by providing explanation of the regulations?	✓		

	Yes	No	Remarks or Not Applicable
VIII. Document Inspection (Review) (Please note if review was performed prior to or during inspection)			
1. Did the inspector thoroughly review the following documents?			
A. For Generators:			
-Inspection records for hazardous waste storage areas	___	___	N/A
-Personnel training records	___	___	
-Contingency plan	___	___	
-Emergency equipment testing and maintenance records	___	___	
-Waste analysis records	___	___	
-Manifests and exception reports	___	___	
-State annual and/or EPA biennial reports	___	___	
-Waste minimization plan	___	___	
B. In addition, for TSDF's:			
-Part A permit application or final issued permit	✓	___	
-Part B application prior to permit issuance	___	✓	
-Operating record	✓	___	
-Waste analysis plan	✓	___	
-Inspection schedule	___	✓	
-Closure and Post Closure Plan	✓	___	
-Financial instruments	___	✓	
-Ground Water Monitoring/Reports	✓	___	
-Other information (treatment plant operations, internal correspondence)	___	___	

II. Remarks

1. What is your overall assessment of the inspection and the inspection report?

The inspection was well conducted. The inspector explained the regulation to the facility Rep and provided him with all necessary documents or guidance to help facilitate compliance.

2. Describe recommendations that may improve the quality of the State inspection and/or inspection report?

None

NOTE: Indicate whether the inspector is is need of additional training or is lacking in a particular skill (e.g. hazardous waste sampling) needed for an adequate inspection.

3. Comments on the inspection that could have a bearing on the State inspector evaluation (e.g., facility status under litigation, inadequate time allocated to perform inspection, complex industrial processes and waste handling practices, or numerous regulated units located on site).

There is a joint effort at this site by RCRA and CERCLA. I will recommend that both work together to recommend a uniform ground-water monitoring program for this site

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APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD981093628 IEPA Number: 0510350004

~~Major~~ LOF Facility: (YES) NO Notified As: Small Q Gen Regulated As: G/TSD

Facility Name: VAN TRAN ELECTRIC CORP.

Street: 1605 VAN TRAN AVE.

City: VANDALIA State: ILLINOIS Zip Code: 62471

Phone: (817) 772-9740 County: FAYETTE

Facility Contact Official: STEVE PARKE Branch/Organization: VAN TRAN - WACO, TEXAS

Title: VICE PRESIDENT - COMPLIANCE OFFICER

Region: 5 Date of Inspection: 7/12/88 Time: (From) 9:20 am (To) 1:30 pm

Type of Inspection: (GWM) RR F/U ___/___/___ (Date of Initial Inspection)

CME completed 7/26/88

Preparer Information:

Name: Charles Reeter

Agency/Title: IEPA - EPS GWM Coordinator

Telephone: (618) 345-4606

Section	Class I	Class II
725.190	1	
725.191 and	1	
725.192 subparts	1	
725.193 therein	1	
725.194	1	
TOTAL Class I's & II's	5	

Type of facility: (check appropriately)

	YES	NO	UNKNOWN	WAVIED
a) surface impoundment				
b) landfill				
c) land treatment facility				
d) disposal waste pile*				

Groundwater Monitoring Program

	YES	NO	UNKNOWN	WAVIED
1. Was the groundwater monitoring program reviewed prior to site visit? if "NO",	X			
a) Was the groundwater program reviewed at the facility prior to site inspection?				
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)		X		

No Agency approved RCRA GWM Program existed at the time of inspection

*Listed separate from landfill for convenience of identification.

See Comments

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U.S. EPA REGION V

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	Yes	No	Unknown	Waived	
3. Has at least one monitoring well been installed in the uppermost aquifer hydraulically upgradient from the limit of the waste management area? 725.191(a)(1)	X				
a) Are ground-water samples from the uppermost aquifer, representative of background ground-water quality and not affected by the facility (as ensured by proper well number, locations and depths?)			X		See comments
4. Have at least three monitoring wells been installed hydraulically downgradient at the limit of the waste handling or management area? 725.191(a)(2)		X			
a) Do well numbers, locations and depths ensure prompt detection of any statistically significant amounts of hazardous waste or hazardous waste constituents that migrate from the waste management area to the uppermost aquifer?		X			See comments
5. Have the locations of the waste management areas been verified to conform with information in the ground-water program?	X				
a) If the facility contains multiple waste management components, is each component adequately monitored?	N/A				
6. Do the numbers, locations, and depths of the ground-water monitoring wells agree with the data in the ground-water monitoring system program? If "No," explain discrepancies.	X				
7. Well completion details. 725.191(c)					
a) Are wells properly cased?	X				
b) Are wells screened (perforated) and packed where necessary to enable sampling at appropriate depths?	X				See comments
c) Are annular spaces properly sealed to prevent contamination of ground-water?	X				

	Yes	No	Unknown	Wavied
8. Has a ground-water sampling and analysis plan been developed? 725.192(a)	___	X	___	
a) Has it been followed?	___	___	___	
b) Is the plan kept at the facility:	___	___	___	
c) Does the plan include procedures and techniques for:				
1) Sample collection?	___	___	___	
2) Sample preservation?	___	___	___	
3) Sample shipment?	___	___	___	
4) Analytical procedures?	___	___	___	
5) Chain of custody control?	___	___	___	
9. Are the required parameters in ground-water samples being tested quarterly for the first year? 725.192(b) and 725.192(c)(1)	___	X	___	
a) Are the ground-water samples analyzed for the following:				
1) Parameters characterizing the suitability of the ground-water as a drinking water supply? 725.192(b)(1)	___	X	___	
2) Parameters establishing ground-water quality? 725.192(b)(2)	___	X	___	
3) Parameters used as indicators of ground-water contamination? 725.192(b)(3)	___	X	___	
(i) For each indicator parameter are at least four replicate measurements obtained at each upgradient well for each sample obtained during the first year of monitoring? 725.192(c)(2)	___	X	___	
(ii) Are provisions made to calculate the initial background arithmetic mean and variance of the respective parameter concentrations or values obtained from the upgradient well(s) during the first year? 725.192(c)(2)	___	X	___	

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See Comments

See Comments

	Yes	No	Unknown	Wavied	
b) For facilities which have completed first year ground-water sampling and analysis requirements:					Not Accomplished
1) Have samples been obtained and analyzed for the ground-water quality parameters at least annually? 725.192(d)(1)	—	—			
2) Have samples been obtained and analyzed for the indicators of ground-water contamination at least semi-annually? 725.192(d)(2)	—	—			
c) Were ground-water surface elevations determined at each monitoring well each time a sample was taken? 725.192(e)	—	X			
d) If it was determined that modification of the number, location or depth of monitoring wells was necessary, was the system brought into compliance with 725.191(a)? 725.193	—	X.			See Comments
10. Has an outline of a ground-water quality assessment program been prepared? 725.193(a)	—	X			
a) Does it describe a program capable of determining:					
1) Whether hazardous waste or hazardous waste constituents have entered the ground-water?	—	—			
2) The rate and extent of migration of hazardous waste or hazardous waste constituents in ground-water?	—	—			
3) Concentrations of hazardous waste or hazardous waste constituents in ground-water?	—	—			
b) Were records kept of the analyses and evaluations, specified in the ground-water quality assessment (throughout the active life of the facility)? 725.194(b)(1)	—	X			
1) If a disposal facility, were(are) records kept through the post-closure period as well?	—	—			

	Yes	No	Unknown	Wavied
11. Have records been kept of analyses for parameters in 725.192(c) and (d)? 725.194(a)(1)	___	X		
12. Have records been kept of ground-water surface elevations taken at the time of sampling for each well? 725.194(a)(1)	___	X		See Comments
13. Have records been kept of required elevations in 725.192(e)? 725.194(a)(1)	___	X		

*EPA will be proposing (Spring 1982) to replace this reporting requirement with an exception reporting system where reports will be submitted only where maximum contaminant levels or significant changes in the contamination indicators or other parameters are observed. EPA has delayed compliance stage for 14 a) above until August 1, 1982 (Federal Register, February 23, 1982, p. 7841-7842) to be coupled with exception reporting in the interim.

APPENDIX A-2

COMPLIANCE FORM FOR A FACILITY WHICH
MAY BE AFFECTING GROUND-WATER QUALITY

Company Name: Van Tran Electric; IEPA I.D. Number: 0510350004

Company Address: 1505 Van Tran Ave; USEPA I.D. Number: ILD981093628
Vandalia, IL.
62471

Inspector's Name: Chuck Reeter

Company Contact/Official: Steve Parker; Branch/Organization: VAN TRAN - WACO, TX

Title: Compliance Officer; Date of Inspection: 7/12/88

Indeterminate

	Yes	No	Unknown
Type of facility: (check appropriately)			
a) surface impoundment	X		
b) landfill			
c) land treatment facility			
d) disposal waste pile			
1. Have comparisons of ground-water contamination indicator parameters for the upgradient well(s) 725.193(b) shown a significant increase (or pH decrease as well) over initial background?			X
a) If "Yes," has this information been submitted to the Director according to 725.194(a)(2)(ii)?			
2. Have comparisons of indicator parameters for the downgradient wells 725.193(b) shown a significant increase (or pH decrease as well) over initial background?			X
a) If "Yes," were additional ground-water samples taken for those downgradient wells where the significant difference was determined? 725.193(c)(2)			
1) Were samples split in two?			
2) Was the significant difference due to human (e.g., laboratory) error? (If "Yes," do not continue.)			

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	Yes	No	Unknown
3. If significant differences were not due to error, was a written notice sent to the Director within 7 days of confirmation?	___	___	
4. Within 15 days of notification of the Director was a certified ground-water quality assessment plan submitted? 725.193(d)(2)	___	___	
a) Does the plan specify 725.193(d)(3):			
1) well information (specifics):			
(a) number?	___	___	
(b) locations?	___	___	
(c) depths?	___	___	
2) sampling methods?	___	___	
3) analytical methods?	___	___	
4) evaluation methods?	___	___	
5) schedule of implementation?	___	___	
b) Does the plan allow for determination of 725.193(d)(4):			
1) Rate and extent of migration of hazardous waste or hazardous waste constituents?	___	___	
2) Concentrations of the hazardous waste or hazardous waste constituents?	___	___	
c) Is it indicated that the first determination was made as soon as technically feasible? 725.193(d)(5)	___	___	
1) Within 15 days after the first determination was a written report containing the assessment of ground-water quality submitted to the Director?		___	___
d) Was it determined that hazardous waste or hazardous waste constituents from the facility have entered the ground-water?	___	___	
1) If "No," was the original indicator evaluation program, required by 725.192 and 725.193(b), reinstated?	___	___	

	Yes	No	Unknown
(a) Was the Director notified of the reinstatement of program within 15 days of the determination? 725.193(d)(6)	___	___	
e) If it was determined that hazardous waste or hazardous waste constituents have entered the ground-water 725.193(d)(7):			
1) For facilities where a program was implemented prior to final closure, are determinations of hazardous waste or hazardous waste constituents continued on a quarterly basis? (If a program was implemented during the post-closure care period, determinations made in accordance with the ground-water quality assessment plan may cease after the first determination.)	___	___	
(a) Were subsequent ground-water quality reports submitted to the Director within 15 days of determination?	___	___	
f) Are annual reports submitted to the Director containing the results of the ground-water quality assessment program? 725.194(b)(2)	___	___	
1) Do the reports include the calculated or measured rate of migration of hazardous waste or hazardous waste constituents during the reporting period?	___	___	

APPENDIX A-3

INSPECTION COMPLIANCE FORM FOR DEMONSTRATING A WAIVER OF INTERIM STATUS REQUIREMENTS

Company Name: Van Tran Elec.; IEPA I.D. Number: 0510350004

Company Address: 1505 Van Tran Ave; USEPA I.D. Number: ILD 981093628

Vandalia IL 62471 Inspector's Name: Chuck Reeter

Company Contact: Steve Parker; Branch/Organization: Van Tran Waco, Tx.

Title: Compliance Officer; Date of Inspection: 7/12/88

Not Applicable

	Yes	No	Unknown
1. Is a written waiver demonstration kept at the site?	___	___	
2. Is the demonstration certified by a qualified geologist or geotechnical engineer? 725.190(c)	___	___	
3. Does the waiver demonstration establish:			
a) The potential for migration of hazardous waste or hazardous waste constituents from the facility to the uppermost aquifer? 725.190(c)(1)	___	___	
b) An evaluation of a water balance including:			
1) Precipitation?	___	___	
2) Evapotranspiration?	___	___	
3) Runoff?	___	___	
4) Infiltration? (including any liquid in surface impoundments)	___	___	
c) Unsaturated zone characteristics?	___	___	
1) Geologic materials?	___	___	
2) Physical properties?	___	___	
3) Depth to ground-water?	___	___	

	Yes	No	Unknown
d) The potential for hazardous waste or hazardous waste constituents which may enter the uppermost aquifer to migrate to a water supply well or surface water, by evaluation of: 725.190(c)(2)			
1) Saturated zone characteristics, including:			
(a) Geologic materials?	___	___	
(b) Physical properties?	___	___	
(c) Rate of ground-water flow?	___	___	
2) Proximity of the facility to water supply wells or surface water?	___	___	

N/A

0510350004 - Fayette Co.
Vandalia/Van Tran
ILD981093628

COMMENTS

Appendix A-1

2. A RCRA groundwater monitoring program has not yet been implemented at the Van Tran facility at the time of this inspection. Guidance has been provided in previous inspections and in letters sent by the Agency.

3. As was indicated in a letter dated May 3, 1988 sent by the Agency, Well MW-D appears to satisfy the requirements for an upgradient well, unless the groundwater flow direction is found to be incorrectly determined.

4. It appears that Well MW-A may satisfy the requirement of a downgradient well of the surface impoundment. However, 2 additional RCRA downgradient wells are needed to meet the minimum requirements for 3 monitoring wells to ensure prompt detection of groundwater contamination.

7. Wells MW-A, B, C, and D were installed according to Agency specifications and procedures for the Superfund Remedial Investigation. Two of these wells will apparently be used in the RCRA groundwater program.

8.
& 9. A RCRA Sampling and Analysis Plan has not been developed or implemented by the facility. The TEGD should be used for guidance in the development of a Plan and it should be implemented according to the RCRA Closure letter to Van Tran dated July 18, 1988.

10. As indicated in previous inspections and in the July 18, 1988 letter, an outline and report should be prepared for a water quality assessment program, and implemented if contamination is present in the groundwater.

12.
&13. Although records have been kept of the groundwater elevations from wells at the facility, they have not been the result of required sampling from the RCRA regulations, 725.192 & 725.194.

Appendix A-2

At this time it is unknown whether the facility may be affecting groundwater quality. Additional sampling for hazardous constituents identified in the July 18, 1988 letter should indicate whether groundwater contamination is present.

Appendix A - CME Worksheet

I.A.1.a.
& b. Van Tran was initially a non-notifier facility and later filed for small quantity generator status. No RCRA Part A and Part B applications were filed.

I.A.1.e. The Superfund Remedial Investigation reports were reviewed prior to the inspection. However, it was learned at the inspection that a recently completed hydrogeologic report by Baker Engineers existed for the Superfund RI, but was unknown and unavailable to the RCRA program at the time of the inspection.

I.A.1.f., g. & h. No RCRA Sampling and Analysis Plan, Groundwater Assessment Program Outline, or regional hydrogeologic reports exist for the facility.

I.B.1.b & c. They do not exist for the old wells, but these techniques were used for the 2 new RCRA wells being installed at the time of inspection.

I.B.1.f. The soil samples at the facility were analyzed for the Agency Hazardous Substance List (HSL) in the previous borings MW-A, B, C, and D and the 2 new RCRA wells currently being installed.

I.B.5. Hydrogeologic characteristics of the site need to be submitted for RCRA program review.

I.B.6.&7. Regional hydrogeologic characteristics need to be acquired and used to assist in verifying the locally observed hydrogeology. If differences exist, for instance, as has been indicated in groundwater flow directions, then reasons for this occurrence should be described in the narrative of the report.

I.C.1.c. One soil boring was drilled to the top of bedrock during the Superfund Remedial Investigation.

I.C.1.h. Although much of this information is not present on the field boring logs, it is described in the narrative that has accompanied the Remedial Investigation report.

I.E. Geologic cross sections of the site using the existing soil boring characteristics should be developed for the RCRA groundwater program. A topographic map from the surveys that were conducted at Van Tran should also be developed for the site.

I.F.1.b. Water level measurements were taken during the Remedial Investigation and at the Agency's request to verify groundwater flow direction.

I.F.1.i. & k. Potentiometric contour maps need to be constructed for the site, along with groundwater flow directions. Apparently, Rich Christensen of Baker Engineers indicated that much of the work has been accomplished and is contained in the recent hydrogeologic report, which the RCRA program has not yet received or reviewed.

I.F.2.b. & c. Groundwater flow direction documentation, as contained in the Baker report, has not been received or reviewed in the RCRA program.

I.F.3. Slug tests or pump tests have not yet been conducted at the facility. It has been indicated that these tests will be accomplished later this summer.

I.F.4.a. The initial Superfund Remedial Investigation provided a basis for characterizing the uppermost aquifer for the facility property. The RCRA program has required additional characterization in relation to the surface impoundment.

I.G. There are currently 8 wells used for the Superfund Remedial Investigation on site. Two of these wells (MW-A and MW-D) will be allowed for use in establishing a RCRA groundwater program for the surface impoundment. Two new RCRA downgradient wells were being installed at the time of this inspection, in order to satisfy the minimum requirements.

I.H.1.c. The previous wells at the facility were installed as a result of a consent decree and court order. The new wells are being installed under Agency direction.

I.I. An assessment outline or plan has not been developed or implemented at the Van Tran facility. This section of the checklist is not applicable.

I.J.1.&3. Additional characterization of the subsurface geology and of the uppermost aquifer with relation to the RCRA regulation of the surface impoundment is required at Van Tran. Apparently, a recent hydrogeologic report was completed by Baker Engineers as a part of the Remedial Investigation for the site. However, this report was unknown and unavailable to the RCRA program at the time of this inspection.

I.J.2. Apparently, a groundwater flow direction discrepancy existed for the site with Baker results and the Agency contractor (Envirodyne). Although Baker Engineering claims that the problem has been resolved, reasons and documentation should be submitted to the RCRA program for review and approval.

I.J.4.b. RCRA groundwater samples have not yet been collected or analyzed. It is unknown if they will be representative of the groundwater quality until a Sampling and Analysis Plan has been implemented for the facility, and the Agency has an opportunity to observe the sampling techniques and review the results.

I.J.6. The detection monitoring system for the impoundment is not adequate to determine if assessment monitoring will be required. Additional detection monitoring wells were being installed at the time of inspection.

II. A field evaluation was conducted of the 8 existing Remedial Investigation wells on the site.

III.,IV., V.,&VI. These are field related sections that will be completed from observations and evaluations made when Van Tran implements its Sampling and Analysis Plan. No RCRA sampling has yet occurred at the facility.

VIII. The facility does not currently have an Agency approved RCRA groundwater monitoring program or Sampling and Analysis Plan. The Agency has transmitted a letter to Van Tran on July 18, 1988 and in previous inspections specifically explaining what will be required in developing a RCRA groundwater program, prior to closure certification of the surface impoundment.

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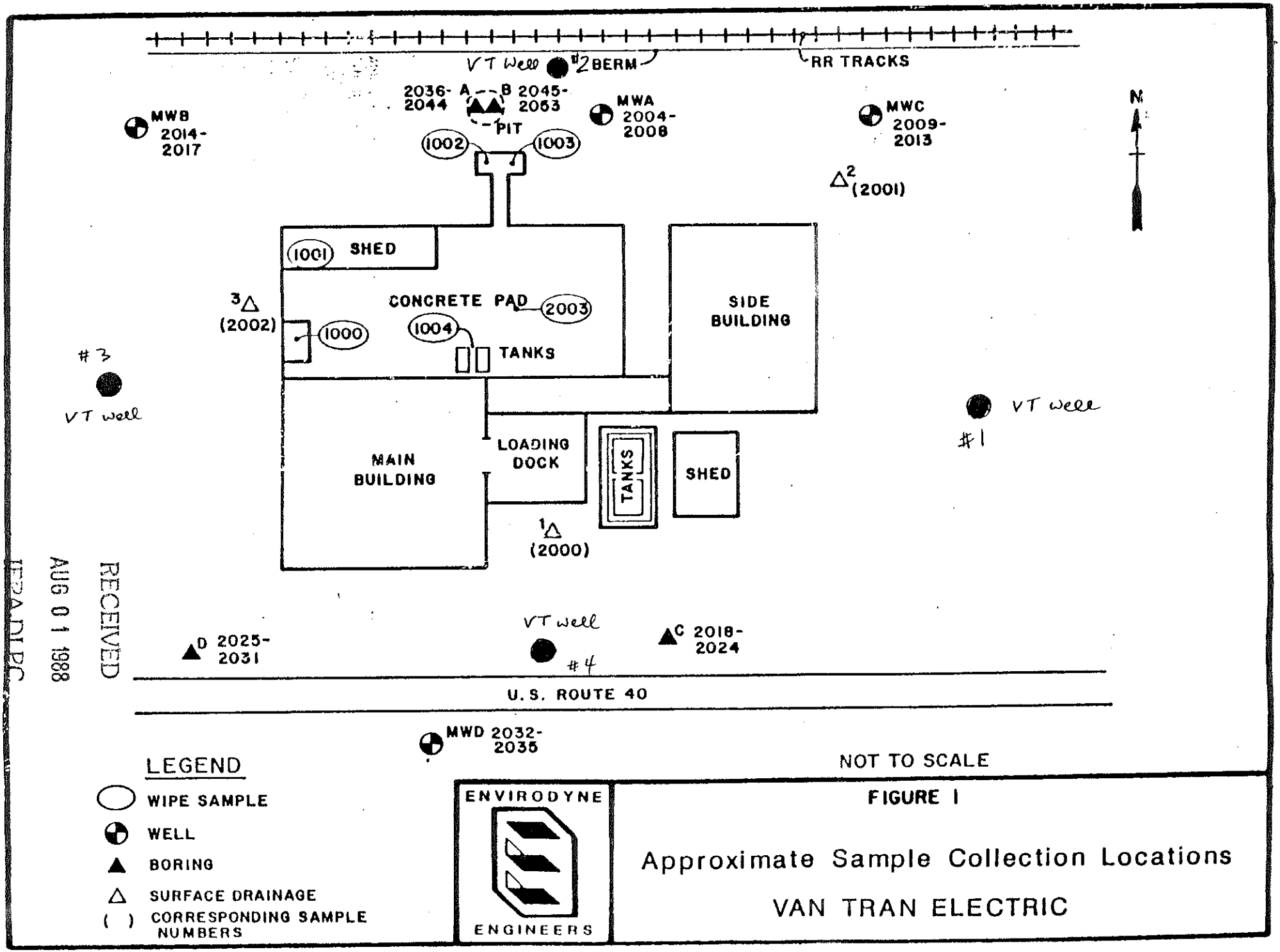

APPENDIX A

COMPREHENSIVE GROUND-WATER MONITORING EVALUATION WORKSHEET

The following worksheets have been designed to assist the enforcement officer/technical reviewer in evaluating the ground-water monitoring system an owner/operator uses to collect and analyze samples of ground water. The focus of the worksheets is technical adequacy as it relates to obtaining and analyzing representative samples of ground water. The basis of the worksheets is the final RCRA Ground Water Monitoring Technical Enforcement Guidance Document which describes in detail the aspects of ground-water monitoring which EPA deems essential to meet the goals of RCRA.

Appendix A is not a regulatory checklist. Specific technical deficiencies in the monitoring system can, however, be related to the regulations as illustrated in Figure 4.3 taken from the RCRA Ground-Water Monitoring Compliance Order Guide (COG) (included at the end of the appendix). The enforcement officer, in developing an enforcement order, should relate the technical assessment from the worksheets to the regulations using figure 4.3 from the COG as a guide.

I. Office Evaluation - Technical Evaluation of the Design of the Ground-water Monitoring System

A. Review of relevant documents:

1. What documents were obtained prior to conducting the inspection:

a. RCRA Part A permit application?	(Y/N)	N/A
b. RCRA Part B permit application?	(Y/N)	N/A
c. Correspondence between the owner/operator and appropriate agencies or citizen's groups?	(Y/N)	Y
d. Previously conducted facility inspection reports?	(Y/N)	Y
e. Facility's contractor reports?	(Y/N)	Y/N
f. Regional hydrogeologic, geologic, or soil reports?	(Y/N)	N
g. The facility's Sampling and Analysis Plan?	(Y/N)	N/A
h. Ground-water Assessment Program Outline (or Plan, if the facility is in assessment monitoring)?	(Y/N)	N/A
i. Other (specify) _____		

see comments

see comments

B. Evaluation of the Owner/Operator's Hydrogeologic Assessment:

1. Did the owner/operator use the following direct techniques in the hydrogeologic assessment:

a. Logs of the soil borings/rock corings (documented by a professional geologist, soil scientist, or geotechnical engineer)?	(Y/N)	Y
b. Materials tests (e.g., grain size analyses, standard penetration tests, etc.)?	(Y/N)	N
c. Piezometer installation for water level measurements at different depths?	(Y/N)	N
d. Slug tests?	(Y/N)	N

see comments

e. Pump tests? (Y/N) N
f. Geochemical analyses of soil samples? (Y/N) Y
g. Other (specify) (e.g., hydrochemical diagrams and wash analysis) _____

see Comments

2. Did the owner/operator use the following indirect techniques to supplement direct techniques data:

a. Geophysical well logs? (Y/N) N
b. Tracer studies? (Y/N) _____
c. Resistivity and/or electromagnetic conductance? (Y/N) _____
d. Seismic Survey? (Y/N) _____
e. Hydraulic conductivity measurements of cores? (Y/N) _____
f. Aerial photography? (Y/N) _____
g. Ground penetrating radar? (Y/N) _____
h. Other (specify) _____

3. Did the owner/operator document and present the raw data from the site hydrogeologic assessment? (Y/N) Y

4. Did the owner/operator document methods (criteria) used to correlate and analyze the information? (Y/N) Y

5. Did the owner/operator prepare the following:

a. Narrative description of geology? (Y/N) Y
b. Geologic cross sections? (Y/N) N
c. Geologic and soil maps? (Y/N) N
d. Boring/coring logs? (Y/N) Y
e. Structure contour maps of the differing water bearing zones and confining layer? (Y/N) N
f. Narrative description and calculation of groundwater flows? (Y/N) N
g. Water table/potentiometric map? (Y/N) N
h. Hydrologic cross sections? (Y/N) N

See Comments

6. Did the owner/operator obtain a regional map of the area and delineate the facility? (Y/N) Y

If yes, does this map illustrate:

a. Surficial geology features? (Y/N) N
b. Streams, rivers, lakes, or wetlands near the facility? (Y/N) Y
c. Discharging or recharging wells near the facility? (Y/N) N

7. Did the owner/operator obtain a regional hydrogeologic map? (Y/N) N

If yes, does this hydrogeologic map indicate:

a. Major areas of recharge/discharge? (Y/N) — see comments
b. Regional ground-water flow direction? (Y/N) —
c. Potentiometric contours which are consistent with observed water level elevations? (Y/N) —

8. Did the owner/operator prepare a facility site map? (Y/N) Y

If yes, does the site map show:

a. Regulated units of the facility (e.g., landfill areas, impoundments)? (Y/N) Y
b. Any seeps, springs, streams, ponds, or wetlands? (Y/N) N/A
c. Location of monitoring wells, soil borings, or test pits? (Y/N) Y
d. How many regulated units does the facility have? 1
If more than one regulated unit then,
o Does the waste management area encompass all regulated units? (Y/N) —
Or
o Is a waste management area delineated for each regulated unit? (Y/N) —

C. Characterization of Subsurface Geology of Site

1. Soil boring/test pit program:

a. Were the soil borings/test pits performed under the supervision of a qualified professional? (Y/N) Y
b. Did the owner/operator provide documentation for selecting the spacing for borings? (Y/N) Y
c. Were the borings drilled to the depth of the first confining unit below the uppermost zone of saturation or ten feet into bedrock? (Y/N) Y — see comments
d. Indicate the method(s) of drilling:
o Auger (hollow or solid stem) X
o Mud rotary
o Reverse rotary
o Cable tool
o Jetting
o Other (specify) _____
e. Were continuous sample corings taken? (Y/N) Y

f. How were the samples obtained (checked method[s])
- o Split spoon — X
- o Shelby tube, or similar — X
- o Rock coring —
- o Ditch sampling —
- o Other (explain) —

g. Were the continuous sample corings logged by a qualified professional in geology? (Y/N) Y

h. Does the field boring log include the following information:
- o Hole name/number? (Y/N) Y
- o Date started and finished? (Y/N) Y
- o Driller's name? (Y/N) N
- o Hole location (i.e., map and elevation)? (Y/N) N
- o Drill rig type and bit/auger size? (Y/N) N
- o Gross petrography (e.g., rock type) of each geologic unit? (Y/N) Y
- o Gross mineralogy of each geologic unit? (Y/N) Y
- o Gross structural interpretation of each geologic unit and structural features (e.g., fractures, gouge material, solution channels, buried streams or valleys, identification of depositional material)? (Y/N) N
- o Development of soil zones and vertical extent and description of soil type? (Y/N) N
- o Depth of water bearing unit(s) and vertical extent of each? (Y/N) N
- o Depth and reason for termination of borehole? (Y/N) N
- o Depth and location of any contaminant encountered in borehole? (Y/N) N
- o Sample location/number? (Y/N) Y
- o Percent sample recovery? (Y/N) N
- o Narrative descriptions of:
  - -- Geologic observations? (Y/N) N
  - -- Drilling observations? (Y/N) Y

i. Were the following analytical tests performed on the core samples:
- o Mineralogy (e.g., microscopic tests and x-ray diffraction)? (Y/N) N
- o Petrographic analysis:
  - degree of crystallinity and cementation of matrix? (Y/N) N
  - degree of sorting, size fraction (i.e., sieving), textural variations? (Y/N) N

- rock type(s)? (Y/N) N
- soil type? (Y/N)
- approximate bulk geochemistry? (Y/N)
- existence of microstructures that may effect or indicate fluid flow? (Y/N)

o Falling head tests? (Y/N)
o Static head tests? (Y/N)
o Settling measurements? (Y/N)
o Centrifuge tests? (Y/N)
o Column drawings? (Y/N)

D. Verification of subsurface geological data

1. Has the owner/operator used indirect geophysical methods to supplement geological conditions between borehole locations? (Y/N) N
2. Do the number of borings and analytical data indicate that the confining layer displays a low enough permeability to impede the migration of contaminants to any stratigraphically lower water-bearing units? (Y/N) N
3. Is the confining layer laterally continuous across the entire site? (Y/N) N
4. Did the owner/operator consider the chemical compatibility of the site-specific waste types and the geologic materials of the confining layer? (Y/N) N
5. Did the geologic assessment address or provide means for resolution of any information gaps of geologic data? (Y/N) Y
6. Do the laboratory data corroborate the field data for petrography? (Y/N) N/A
7. Do the laboratory data corroborate the field data for mineralogy and subsurface geochemistry? (Y/N) N/A

E. Presentation of geologic data

1. Did the owner/operator present geologic cross sections of the site? (Y/N) N
2. Do cross sections:
   a. identify the types and characteristics of the geologic materials present? (Y/N)
   b. define the contact zones between different geologic materials?
   c. note the zones of high permeability or fracture? (Y/N)
   d. give detailed borehole information including:
      o location of borehole? (Y/N)
      o depth of termination? (Y/N)
      o location of screen (if applicable)? (Y/N)
      o depth of zone(s) of saturation? (Y/N)
      o backfill procedure?

3. Did the owner/operator provide a topographic map which was constructed by a licensed surveyor? (Y/N) N
4. Does the topographic map provide:
   a. contours at a maximum interval of two-feet? (Y/N)
   b. locations and illustrations of man-made features (e.g., parking lots, factory buildings, drainage ditches, storm drains, pipelines, etc.)? (Y/N)
   c. descriptions of nearby water bodies? (Y/N)
   d. descriptions of off-site wells? (Y/N)
   e. site boundaries? (Y/N)
   f. individual RCRA units? (Y/N)
   g. delineation of the waste management area(s)? (Y/N)
   h. well and boring locations? (Y/N)
5. Did the owner/operator provide an aerial photograph depicting the site and adjacent off-site features? (Y/N) N
6. Does the photograph clearly show surface water bodies, adjacent municipalities, and residences and are these clearly labelled? (Y/N) N

F. Identification of Ground-Water Flowpaths

1. Ground-water flow direction

   a. Was the well casing height measured by a licensed surveyor to the nearest 0.01 feet? (Y/N) Y
   b. Were the well water level measurements taken within a 24 hour period? (Y/N) Y see Comments
   c. Were the well water level measurements taken to the nearest 0.01 feet? (Y/N) Y
   d. Were the well water levels allowed to stabilize after construction and development for a minimum of 24 hours prior to measurements? (Y/N) Y
   e. Was the water level information obtained from (check appropriate one):
      o multiple piezometers placed in single borehole? ____
      o vertically nested piezometers in closely spaced separate boreholes? ____
      o monitoring wells X

f. Did the owner/operator provide construction details for the piezometers? (Y/N) Y

g. How were the static water levels measured (check method(s).
- o Electric water sounder X
- o Wetted tape X
- o Air line
- o Other (explain)

h. Was the well water level measured in wells with equivalent screened intervals at an equivalent depth below the saturated zone? (Y/N) Y

i. Has the owner/operator provided a site water table (potentiometric) contour map? If yes, N
- o Do the potentiometric contours appear logical and accurate based on topography and presented data? (Consult water level data) (Y/N)
- o Are ground-water flow-lines indicated? (Y/N)
- o Are static water levels shown? (Y/N)
- o Can hydraulic gradients be estimated? (Y/N) see

j. Did the owner/operator develop hydrologic cross sections of the vertical flow component across the site using measurements from all wells? (Y/N) N Comment

k. Do the owner/operator's flow nets include:
- o piezometer locations? (Y/N)
- o depth of screening? (Y/N)
- o width of screening? (Y/N)
- o measurements of water levels from all wells and piezometers? (Y/N)

2. Seasonal and temporal fluctuations in ground-water level

a. Do fluctuations in static water levels occur? (Y/N) Y
- o If yes, are the fluctuations caused by any of the following:

-- Off-site well pumping (Y/N) N
— Tidal processes or other intermittent natural variations (e.g., river stage, etc.) (Y/N) N
— On-site well pumping (Y/N) N
-- Off-site, on-site construction or changing land use patterns (Y/N) N
-- Deep well injection (Y/N) N
— Seasonal variations (Y/N) Y
-- Other (specify) _____

b. Has the owner/operator documented sources and patterns that contribute to or affect the ground-water patterns below the waste management? (Y/N) N See Comment

c. Do water level fluctuations alter the general ground-water gradients and flow directions? (Y/N) Unknown

d. Based on water level data, do any head differentials occur that may indicate a vertical flow component in the saturated zone? (Y/N) Unknown

e. Did the owner/operator implement means for gauging long term effects on water movement that may result from on-site or off-site construction or changes in land-use patterns? (Y/N) N

3. Hydraulic conductivity

a. How were hydraulic conductivities of the subsurface materials determined?
   - o Single-well tests (slug tests)? (Y/N) N
   - o Multiple-well tests (pump tests) (Y/N) N See Comment
   - o Other (specify)

b. If single-well tests were conducted, was it done by:
   - o Adding or removing a known volume of water, or (Y/N)
   - o Pressurizing well casing (Y/N)

c. If single well tests were conducted in a highly permeable formation, were pressure transducers and high-speed recording equipment used to record the rapidly changing water levels? (Y/N)

d. Since single well tests only measure hydraulic conductivity in a limited area, were enough tests run to ensure a representative measure of conductivity in each hydrogeologic unit? (Y/N)

e. Is the owner/operator's slug test data (if applicable) consistent with existing geologic information (e.g., boring logs)? (Y/N)

f. Were other hydraulic conductivity properties determined? (Y/N)

g. If yes, provide any of the following data, if available:
   - o Transmissivity
   - o Storage coefficient
   - o Leakage
   - o Permeability
   - o Porosity
   - o Specific capacity
   - o Other (specify) _____

4. Identification of the uppermost aquifer

a. Has the extent of the uppermost saturated zone (aquifer) in the facility area been defined? If yes, (Y/N) Y/N
   o Are soil boring/test pit logs included? (Y/N) Y
   o Are geologic cross-sections included? (Y/N) N
   See Comment
b. Is there evidence of confining (competent, unfractured, continuous, and low permeability) layers beneath the site? (Y/N) N
   o If yes, how was continuity demonstrated?

   _____

   _____

c. What is hydraulic conductivity of the confining unit (if present)? ___ CM/Sec
   How was it determined? Unknown
d. Does potential for other hydraulic communication exist (e.g., lateral incontinuity between geologic units, facies changes, fracture zones, cross cutting structures, or chemical corrosion/alteration of geologic units by leachage? (Y/N) Y
   If yes or no what is the rationale? Indeterminate - intermittent sand & clay layers - glacial Till

G. Office Evaluation of the Facility's Ground-Water Monitoring System

Monitoring Well Design and Construction:
These questions should be answered for each different well design present at the facility.

1. Drilling Methods

a. What drilling method was used for the well?
   o Hollow-stem auger X
   o Solid-stem auger
   o Mud rotary
   o Air rotary
   o Reverse rotary
   o Cable tool
   o Jetting
   o Air drill with casing hammer
   o Other (specify) _____
b. Were any cutting fluids (including water) or additives used during drilling? (Y/N) N
   If yes, specify
   Type of drilling fluid _____
   Source of water used _____
   Foam _____
   Polymers _____
   Other _____

c. Was the cutting fluid, or additive, identified? (Y/N) N/A
d. Was the drilling equipment steam-cleaned prior to drilling the well? (Y/N) Y
Other methods _____

e. Was compressed air used during drilling? (Y/N) N
o If yes, was the air filtered to remove oil? (Y/N) —
f. Did the owner/operator document procedure for establishing the potentiometric surface? (Y/N) Y
o If yes, how was the location established?

_____

_____

_____

_____

_____

g. Formation samples
o Were formation samples collected initially during drilling? (Y/N) Y
o Were any cores taken continuous? (Y/N) Y
If not, at what interval were samples taken? _____

_____

o How were the samples obtained?
- Split spoon X
- Shelby tube X
- Core drill
- Other (specify) _____

o Identify if any physical and/or chemical tests were performed on the formation samples (specify)
lab chemical analyses - priority pollutants
particle size analyses on new wells

2. Monitoring Well Construction Materials

a. Identify construction materials (by number) and diameters (ID/OD)

	Material	Diameter (ID/OD)
o Primary Casing	pvc & ss	2"
o Secondary or outside casing (double construction)	steel	variable
o Screen	pvc & ss	2"

b. How are the sections of casing and screen connected?
o Pipe sections threaded X
o Couplings (friction) with adhesive or solvent
o Couplings (friction) with retainer screws
o Other (specify) _____

c. Were the materials steam-cleaned prior to installation? (Y/N) Y
If no, how were the materials cleaned? _____

3. Well Intake Design and Well Development

a. Was a well intake screen installed? (Y/N) Y
o What is the length of the screen for the well? 5' old wells - 10' new wells
o Is the screen manufactured? (Y/N) ___
b. Was a filter pack installed? (Y/N) ___
o What kind of filter pack was employed? silica sand
o Is the filter pack compatible with formation materials? (Y/N) Y
o How was the filter pack installed? dropping down hole
o What are the dimensions of the filter pack? 7 3/4 od / variable length
o Has a turbidity measurement of the well water ever been made? (Y/N) N
o Have the filter pack and screen been designed for the in situ materials? (Y/N) Y
c. Well development
Was the well developed? (Y/N) Y
o What technique was used for well development?
- Surge block
- Bailer X
- Air surging X
- Water pumping
- Other (specify)

4. Annular Space Seals

a. What is the annular space in the saturated zone directly above the filter pack filled with?
- Sodium bentonite (specify type and grit) bentonite pellets
- Cement (specify neat of concrete)
- Other (specify)
o Was the seal installed by?
- Dropping material down the hole and tamping X
- Dropping material down the inside of hollow-stem auger
- Tremie pipe method
- Other (specify)

b. Was a different seal used in the unsaturated zone? (Y/N) Y
If yes,
o Was this seal made with?
- Sodium bentonite (specify type and grit) bentonite pellets
- Cement (specify neat or concrete)
- Other (specify) Cement-bentonite slurry

o Was this seal installed by?
- Dropping material down the hole and tamping X
- Dropping material down the inside of hollow stem auger ____
- Other (specify) _____

c. Is the upper portion of the borehole sealed with a concrete cap to prevent infiltration from the surface? (Y/N) Y
d. Is the well fitted with an above-ground protective device and bumper guards? (Y/N) Y
e. Has the protective cover been installed with locks to prevent tampering (Y/N) Y

H. Evaluation of the Facility's Detection Monitoring Program

1. Placement of Downgradient Detection Monitoring Wells

a. Are the ground-water monitoring wells or clusters located immediately adjacent to the waste management area? (Y/N) N
b. How far apart are the detection monitoring wells?
refer to attached map

c. Does the owner/operator provide a rationale for the location of each monitoring well or cluster? (Y/N) Y see comments
d. Has the owner/operator identified the well screen lengths of each monitoring well or clusters? (Y/N) Y
e. Does the owner/operator provide an explanation for the well screen lengths of each monitoring well or cluster? (Y/N) Y
f. Do the actual locations of monitoring wells or clusters correspond to those identified by the owner/operator? (Y/N) Y

2. Placement of Upgradient Monitoring Wells

a. Has the owner/operator documented the location of each upgradient monitoring well or cluster? (Y/N) Y
b. Does the owner/operator provide an explanation for the location(s) of the upgradient monitoring wells? (Y/N) Y
c. What length screen has the owner/operator employed in the background monitoring well(s)?
5 feet

d. Does the owner/operator provide an explanation for the screen length(s) chosen? (Y/N) Y
e. Does the actual location of each background monitoring well or cluster correspond to that identified by the owner/operator? (Y/N) Y

I. Office Evaluation of the Facility's Assessment Monitoring Program

N/A

1. Does the assessment plan specify:
   a. The number, location, and depth of wells? (Y/N)
   b. The rationale for their placement and identify the basis that will be used to select subsequent sampling locations and depths in later assessment phases? (Y/N)
2. Does the list of monitoring parameters include all hazardous waste constituents from the facility? (Y/N)
   a. Does the water quality parameter list include other important indicators not classified as hazardous waste constituents? (Y/N) See Comments
   b. Does the owner/operator provide documentation for the listed wastes which are not included? (Y/N)
3. Does the owner/operator's assessment plan specify the procedures to be used to determine the rate of constituent migration in the ground-water? (Y/N)
4. Has the owner/operator specified a schedule of implementation in the assessment plan? (Y/N)
5. Have the assessment monitoring objectives been clearly defined in the assessment plan? (Y/N)
   a. Does the plan include analysis and/or re-evaluation to determine if significant contamination has occurred in any of the detection monitoring wells? (Y/N)
   b. Does the plan provide for a comprehensive program of investigation to fully characterize the rate and extent of contaminant migration from the facility? (Y/N)
   c. Does the plan call for determining the concentrations of hazardous wastes and hazardous waste constituents in the ground water? (Y/N)
   d. Does the plan employ a quarterly monitoring program? (Y/N)
6. Does the assessment plan identify the investigatory methods that will be used in the assessment phase? (Y/N)
   a. Is the role of each method in the evaluation fully described? (Y/N)
   b. Does the plan provide sufficient descriptions of the direct methods to be used? (Y/N)
   c. Does the plan provide sufficient descriptions of the indirect methods to be used? (Y/N)
   d. Will the method contribute to the further characterization of the contaminant movement? (Y/N)
7. Are the investigatory techniques utilized in the assessment program based on direct methods? (Y/N)
   a. Does the assessment approach incorporate indirect methods to further support direct methods? (Y/N)
   b. Will the planned methods called for in the assessment approach ultimately meet performance standards for assessment monitoring? (Y/N)

N/A

c. Are the procedures well defined? (Y/N)
d. Does the approach provide for monitoring wells similar in design and construction as the detection monitoring wells? (Y/N)
e. Does the approach employ taking samples during drilling or collecting core samples for further analysis? (Y/N)

8. Are the indirect methods to be used based on reliable and accepted geophysical techniques? (Y/N)
   a. Are they capable of detecting subsurface changes resulting from contaminant migration at the site? (Y/N)
   b. Is the measurement at an appropriate level of sensitivity to detect ground-water quality changes at the site? (Y/N)
   d. Is the method appropriate considering the nature of the subsurface materials? (Y/N)
   e. Does the approach consider the limitations of these methods? (Y/N)
   f. Will the extent of contamination and constituent concentration be based on direct methods and sound engineering judgment? (Using indirect methods to further substantiate the findings) (Y/N)
9. Does the assessment approach incorporate any mathematical modeling to predict contaminant movement? (Y/N)
   a. Will site specific measurements be utilized to accurately portray the subsurface? (Y/N)
   b. Will the derived data be reliable? (Y/N)
   c. Have the assumptions been identified? (Y/N)
   d. Have the physical and chemical properties of the site-specific wastes and hazardous waste constituents been identified? (Y/N)

J. Conclusions

1. Subsurface geology

   a. Has sufficient data been collected to adequately define petrography and petrographic variation? (Y/N) Y
   b. Has the subsurface geochemistry been adequately defined? (Y/N) N
   c. Was the boring/coring program adequate to define subsurface geologic variation? (Y/N) N See comments
   d. Was the owner/operator's narrative description complete and accurate in its interpretation of the data? (Y/N) Y
   e. Does the geologic assessment address or provide means to resolve any information gaps? (Y/N) N

2. Ground-water flowpaths

a. Did the owner/operator adequately establish the horizontal and vertical components of ground-water flow? (Y/N) N
b. Were appropriate methods used to establish ground-water flowpaths? (Y/N) Y/N see comments
c. Did the owner/operator provide accurate documentation? (Y/N) N
d. Are the potentiometric surface measurements valid? (Y/N) Unknown
e. Did the owner/operator adequately consider the seasonal and temporal effects on the ground-water? (Y/N) Y
f. Were sufficient hydraulic conductivity tests performed to document lateral and vertical variation in hydraulic conductivity in the entire hydrogeologic subsurface below the site? (Y/N) N

3. Uppermost aquifer

a. Did the owner/operator adequately define the uppermost aquifer? (Y/N) N see Comments

4. Monitoring Well Construction and Design

a. Do the design and construction of the owner/operator's ground-water monitoring wells permit depth discrete ground-water samples to be taken? (Y/N) Y
b. Are the samples representative of ground-water quality? (Y/N) Unknown
c. Are the ground-water monitoring wells structurally stable? (Y/N) Y
d. Does the ground-water monitoring well's design and construction permit an accurate assessment of aquifer characteristics? (Y/N) N

5. Detection Monitoring

a. Downgradient Wells
Do the location, and screen lengths of the ground-water monitoring wells or clusters in the detection monitoring system allow the immediate detection of a release of hazardous waste or constituents from the hazardous waste management area to the uppermost aquifer? (Y/N) N additional wells currently being installed

b. Upgradient Wells
Do the location and screen lengths of the upgradient (background) ground-water monitoring wells ensure the capability of collecting ground-water samples representative of upgradient (background) ground-water quality including any ambient heterogenous chemical characteristics? (Y/N) Y

6. Assessment Monitoring

a. Has the owner/operator adequately characterized site hydrogeology to determine contaminant migration? (Y/N) N
b. Is the detection monitoring system adequately designed and constructed to immediately detect any contaminant release? (Y/N) N
c. Are the procedures used to make a first determination of contamination adequate? (Y/N)
d. Is the assessment plan adequate to detect, characterize, and track contaminant migration? (Y/N)
e. Will the assessment monitoring wells, given site hydrogeologic conditions, define the extent and concentration of contamination in the horizontal and vertical planes? (Y/N)
f. Are the assessment monitoring wells adequately designed and constructed? (Y/N)
g. Are the sampling and analysis procedures adequate to provide true measures of contamination? (Y/N)
h. Do the procedures used for evaluation of assessment monitoring data result in determinations of the rate of migration, extent of migration, and hazardous constituent composition of the contaminant plume? (Y/N)
i. Are the data collected at sufficient frequency and duration to adequately determine the rate of migration? (Y/N)
j. Is the schedule of implementation adequate? (Y/N)
k. Is the owner/operator's assessment monitoring plan adequate? (Y/N)
   o If the owner/operator had to implement his assessment monitoring plan, was it implemented satisfactorily? (Y/N)

II. Field Evaluation

A. Ground-water monitoring system:
Are the numbers, depths, and locations of monitoring wells in agreement with those reported in the facility's monitoring plan? (See Section 3.2.3) (Y/N) Y

B. Monitoring well construction:
1. Identify construction material

	Material	Diameter
a. Primary Casing	PVC & SS	2"
b. Secondary or outside casing	steel	variable

2. Is the upper portion of the borehole sealed with concrete to prevent infiltration from the surface? (Y/N) Y

3. Is the well fitted with an above-ground protective device? (Y/N) Y

4. Is the protective cover fitted with locks to prevent tampering? (Y/N) Y

If a facility utilizes more than a single well design, answer the above questions for each well design.

Facility has not yet sampled for RCRA constituents

III. Review of Sample Collection Procedures

A. Measurement of well depths elevation:

1. Are measurements of both depth to standing water and depth to the bottom of the well made? (Y/N) ___ See

2. Are measurements taken to the 0.01 feet? (Y/N) ___ Comments

3. What device is used?

_____

4. Is there a reference point established by a licensed surveyor? (Y/N) ___

5. Is the measuring equipment properly cleaned between well locations to prevent cross contamination? (Y/N) ___

B. Detection of immiscible layers:

1. Are procedures used which will detect light phase immiscible layers? (Y/N) ___

2. Are procedures used which will detect heavy phase immiscible layers? (Y/N) ___

C. Sampling of immiscible layers:

1. Are the immiscible layers sampled separately prior to well evacuation? (Y/N) ___

2. Do the procedures used minimize mixing with water soluble phases? (Y/N) ___

D. Well evacuation:

1. Are low yielding wells evacuated to dryness? (Y/N) ___

2. Are high yielding wells evacuated so that at least three casing volumes are removed? (Y/N) ___

3. What device is used to evacuate the wells?

_____

4. If any problems are encountered (e.g., equipment malfunction) are they noted in a field logbook? (Y/N) ___

E. Sample withdrawal:

1. For low yielding wells, are samples for volatiles, pH, and oxidation/reduction potential drawn first after the well recovers? (Y/N) ___

2. Are samples withdrawn with either flurocarbon/resins or stainless steel (316, 304 or 2205) sampling devices? (Y/N) ___

3. Are sampling devices either bottom valve bailers or positive gas displacement bladder pumps? (Y/N) ___

4. If bailers are used, is fluorocarbon/resin coated wire, single strand stainless steel wire, or monofilament used to raise and lower the bailer? (Y/N) ___

5. If bladder pumps are used, are they operated in a continuous manner to prevent aeration of the sample? (Y/N) ___

6. If bailers are used, are they lowered slowly to prevent degassing of the water? (Y/N) ___

7. If bailers are used, are the contents transferred to the sample container in a way that minimizes agitation and aeration? (Y/N) ___

8. Is care taken to avoid placing clean sampling equipment on the ground or other contaminated surfaces prior to insertion into the well? (Y/N) ___

9. If dedicated sampling equipment is not used, is equipment disassembled and thoroughly cleaned between samples? (Y/N) ___

10. If samples are for inorganic analysis, does the cleaning procedure include the following sequential steps:
a. Dilute acid rinse (HNO_3 or HCl)? (Y/N) ___

11. If samples are for organic analysis, does the cleaning procedure include the following sequential steps:
a. Nonphosphate detergent wash? (Y/N) ___
b. Tap water rinse? (Y/N) ___

c. Distilled/deionized water rinse? (Y/N) ___
d. Acetone rinse? (Y/N) ___
e. Pesticide-grade hexane rinse? (Y/N) ___

12. Is sampling equipment thoroughly dry before use? (Y/N) ___

13. Are equipment blanks taken to ensure that sample cross-contamination has not occurred? (Y/N) ___

14. If volatile samples are taken with a positive gas displacement bladder pump, are pumping rates below 100 ml/min? (Y/N) ___

F. In-situ or field analyses:

1. Are the following labile (chemically unstable) parameters determined in the field:
   a. pH? (Y/N) ___
   b. Temperature? (Y/N) ___
   c. Specific conductivity? (Y/N) ___
   d. Redox potential? (Y/N) ___
   e. Chlorine? (Y/N) ___
   f. Dissolved oxygen? (Y/N) ___
   g. Turbidity? (Y/N) ___
   h. Other (specify) _____

2. For in-situ determinations, are they made after well evacuation and sample removal? (Y/N) ___

3. If sample is withdrawn from the well, is parameter measured from a split portion? (Y/N) ___

4. Is monitoring equipment calibrated according to manufacturers' specifications and consistent with SW-846? (Y/N) ___

5. Is the date, procedure, and maintenance for equipment calibration documented in the field logbook? (Y/N) ___

IV. Review of Sample Preservation and Handling Procedures

See comments

A. Sample containers:

1. Are samples transferred from the sampling device directly to their compatible containers? (Y/N) ___

2. Are sample containers for metals (inorganics) analyses polyethylene with polypropylene caps? (Y/N) ___

3. Are sample containers for organics analysis glass bottles with fluorocarbonresin-lined caps? (Y/N) ___

4. If glass bottles are used for metals samples are the caps fluorocarbonresin-lined? (Y/N) ___

5. Are the sample containers for metal analyses cleaned using these sequential steps?
   a. Nonphosphate detergent wash? (Y/N) ___
   b. 1:1 nitric acid rinse? (Y/N) ___
   c. Tap water rinse? (Y/N) ___
   d. 1:1 hydrochloric acid rinse? (Y/N) ___
   e. Tap water rinse? (Y/N) ___
   f. Distilled/deionized water rinse? (Y/N) ___

6. Are the sample containers for organic analyses cleaned using these sequential steps?
   a. Nonphosphate detergent/hot water wash? (Y/N) ___
   b. Tap water rinse? (Y/N) ___
   c. Distilled/deionized water rinse? (Y/N) ___
   d. Acetone rinse? (Y/N) ___
   e. Pesticide-grade hexane rinse? (Y/N) ___

7. Are trip blanks used for each sample container type to verify cleanliness? (Y/N) ___

B. Sample preservation procedures:

1. Are samples for the following analyses cooled to 4°C:
   a. TOC? (Y/N) ___
   b. TOX? (Y/N) ___
   c. Chloride? (Y/N) ___
   d. Phenols? (Y/N) ___
   e. Sulfate? (Y/N) ___
   f. Nitrate? (Y/N) ___
   g. Coliform bacteria? (Y/N) ___
   h. Cyanide? (Y/N) ___
   i. Oil and grease? (Y/N) ___
   j. Hazardous constituents (§261, Appendix VIII)? (Y/N) ___

2. Are samples for the following analyses field acidified to pH <2 with HNO_3:
   a. Iron? (Y/N) ___
   b. Manganese? (Y/N) ___
   c. Sodium? (Y/N) ___
   d. Total metals? (Y/N) ___
   e. Dissolved metals? (Y/N) ___
   f. Fluoride? (Y/N) ___
   g. Endrin? (Y/N) ___
   h. Lindane? (Y/N) ___
   i. Methoxychlor? (Y/N) ___
   j. Toxaphene? (Y/N) ___

k. 2,4, D? (Y/N) ___
l. 2,4,5, TP Silvex? (Y/N) ___
m. Radium? (Y/N) ___
n. Gross alpha? (Y/N) ___
o. Gross beta? (Y/N) ___

3. Are samples for the following analyses field acidified to pH <2 with H_2SO_4:
   a. Phenols? (Y/N) ___
   b. Oil and grease? (Y/N) ___

4. Is the sample for TOC analyses field acidified to pH <2 with HCl? (Y/N) ___

5. Is the sample for TOX analysis preserved with 1 ml of 1.1 M sodium sulfite? (Y/N) ___

6. Is the sample for cyanide analysis preserved with NaOH to pH >12? (Y/N) ___

C. Special handling considerations:
   1. Are organic samples handled without filtering? (Y/N) ___

   2. Are samples for volatile organics transferred to the appropriate vials to eliminate headspace over the sample? (Y/N) ___

   3. Are samples for metal analysis split into two portions? (Y/N) ___

   4. Is the sample for dissolved metals filtered through a 0.45 micron filter? (Y/N) ___

   5. Is the second portion not filtered and analyzed for total metals? (Y/N) ___

   6. Is one equipment blank prepared each day of ground-water sampling? (Y/N) ___

V. Review of Chain-of-Custody Prodecures

See comments

A. Sample labels
   1. Are sample labels used? (Y/N) ___

   2. Do they provide the following information:
      a. Sample identification number? (Y/N) ___
      b. Name of collector? (Y/N) ___
      c. Date and time of collection? (Y/N) ___
      d. Place of collection? (Y/N) ___
      e. Parameter(s) requested and preservatives used? (Y/N) ___

3. Do they remain legible even if wet? (Y/N) ___

B. Sample seals:
1. Are sample seals placed on those containers to ensure the samples are not altered? (Y/N) ___

C. Field logbook:
1. Is a field logbook maintained? (Y/N) ___

2. Does it document the following:
a. Purpose of sampling (e.g., detection or assessment)? (Y/N) ___
b. Location of well(s)? (Y/N) ___
c. Total depth of each well? (Y/N) ___
d. Static water level depth and measurement technique? (Y/N) ___
e. Presence of immiscible layers and detection method? (Y/N) ___
f. Collection method for immiscible layers and sample identification numbers? (Y/N) ___
g. Well evacuation procedures? (Y/N) ___
h. Sample withdrawal procedure? (Y/N) ___
i. Date and time of collection? (Y/N) ___
j. Well sampling sequence? (Y/N) ___
k. Types of sample containers and sample identification number(s)? (Y/N) ___
l. Preservative(s) used? (Y/N) ___
m. Parameters requested? (Y/N) ___
n. Field analysis data and method(s)? (Y/N) ___
o. Sample distribution and transporter? (Y/N) ___
p. Field observations? (Y/N) ___
o Unusual well recharge rates? (Y/N) ___
o Equipment malfunction(s)? (Y/N) ___
o Possible sample contamination? (Y/N) ___
o Sampling rate? (Y/N) ___

D. Chain-of-custody record:
1. Is a chain-of-custody record included with each sample? (Y/N) ___
2. Does it document the following:
a. Sample number? (Y/N) ___
b. Signature of collector? (Y/N) ___
c. Date and time of collection? (Y/N) ___
d. Sample type? (Y/N) ___
e. Station location? (Y/N) ___
f. Number of containers? (Y/N) ___
g. Parameters requested? (Y/N) ___
h. Signatures of persons involved in the chain-of-possession? (Y/N) ___
i. Inclusive dates of possession? (Y/N) ___

E. Sample analysis request sheet:

1. Does a sample analysis request sheet accompany each sample? (Y/N) ___

2 Does the request sheet document the following:

a. Name of person receiving the sample? (Y/N) ___
b. Date of sample receipt? (Y/N) ___
c. Laboratory sample number (if different than field number)? (Y/N) ___
d. Analyses to be performed? (Y/N) ___

VI. Review of Quality Assurance/Quality Control

See comments

A. Is the validity and reliability of the laboratory and field generated data ensured by a QA/QC program? (Y/N) ___

B. Does the QA/QC program include:

1. Documentation of any deviations from approved procedures? (Y/N) ___

2. Documentation of analytical results for:

a. Blanks? (Y/N) ___
b. Standards? (Y/N) ___
c. Duplicates? (Y/N) ___
d. Spiked samples? (Y/N) ___
e. Detectable limits for each parameter being analyzed? (Y/N) ___

C. Are approved statistical methods used? (Y/N) ___

D. Are QC samples used to correct data? (Y/N) ___

E. Are all data critically examined to ensure it has been properly calculated and reported? (Y/N) ___

VII. Surficial Well Inspection and Field Observation

A. Are the wells adequately maintained? (Y/N) Y

B. Are the monitoring wells protected and secure? (Y/N) Y

C. Do the wells have surveyed casing elevations? (Y/N) Y

D. Are the ground-water samples turbid? (Y/N) Unknown

E. Have all physical characteristics of the site been noted in the inspector's field notes (i.e., surface waters, topography, surface features)? (Y/N) N/A

F. Has a site sketch been prepared by the field inspector with a scale, north arrow, location(s) of buildings, location(s) of regulated units, location of monitoring wells, and a rough depiction of the site drainage pattern? (Y/N) N

Used facility's site sketch

VIII. Conclusions

A. Is the facility currently operating under the correct monitoring program according to the statistical analyses performed by the current operator? (Y/N) N

B. Does the ground-water monitoring system, as designed and operated, allow for detection or assessment of any possible ground-water contamination caused by the facility? (Y/N) N See comment

C. Does the sampling and analysis procedures permit the owner/operator to detect and, where possible, assess the nature and extent of a release of hazardous constituents to ground water from the monitored hazardous waste management facility? (Y/N) N

ENVIRONMENTAL PROTECTION AGENCY

INSPECTION REPORT

USEPA Number: ILD981093628 IEPA Number: 0510350004

Facility Name: Van Tran Electric Corp.

Street: 1505 Van Tran Avenue

City: Vandalia Telephone: 618/283-3220

County: Fayette State: Ill. Zip Code: 62471

Type of Facility: Notified As: SQG Regulated As: Storage

LDF? yes ✓ no __ HPV? yes ✓ no __ 90 Day Follow-up Required? yes __ no N/A ✓ Violations Resolved

Region: 6 Date of Inspection: 8/21/87 From: 10:20 to 12:00

Weather (LDF Only): Sunny, ~85°

Type of Inspection

ISS: X Sampling: __ Citizen Complaint: __ Closed: __ Withdrawal: __

Record Review: __ Follow-up to Inspection of _____: __ Other: __

Non Regulated Status

Small Quant. Gen.:: __ Claimed Nonhandler: __ Other(Specify in narrative): __

Notified As/Regulated As Matrix Number: ____ Key Letter: ____

Notification date, 9/24/85, from initial X or subsequent __ notification.

Part A date, NONE, from initial __ or amended __ Part A.

Part B permit application submitted? yes __ no X

Has the firm been referred to: USEPA? yes __ no X; IAG? yes X no __; County States Attorney? yes __ no X. Date of referral to USEPA: _____,

IAG: 8/14/85, County States Attorney: _____.

Federal Court Order Issued: _____ State Court Order Issued: _____

USEPA Compliance Order Issued: _____ Illinois PCB Order Issued: _____

TSD Facility Activity Summary

Activity (By Process Code)	On Pt A	Activity Conducted Prior to 1980	Was Activity Ever Done	Closed	Being Done at Time of Inspection	Exempt From Regulation per 35 IAC, Section:	On Annual Report For 84	85	86
504	NO	N/A	YES	No	No-Partially Emptied + Backfilled	No	No	No	No
501	NO	N/A	YES	No	Yes	No	N/A	N/A	No

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Operator: Van Trac Electric Corp Telephone #: 817/772-9740

Street: 7711 Imperial Drive

City: Waco State: Tx Zip Code: 76710

Owner: SAME AS OPERATOR Telephone #:

Street:

City: State: Zip Code:

Person Interviewed	Title	Telephone #
Steve Parke	Vice President	817/772-9740
Bob Smith	Plant Supervisor	618/283-3220

Inspection Participants	Agency/Title	Telephone #
Rocky Ballard	IEPA/LSCT	618/345-4636
Mike Grant	IEPA/EPS	618/345-4636

Prepared By	Agency/Title	Telephone #
Michael D. Grant	IEPA/EPS	618/345-4636

Summary of Apparent Violations

Area	Class	Section
OTH	I	203.150
OTH	I	722.111
OTH	I	725.114
OTH	II	725.115
OTH	II	725.116
OTH	II	725.137
OTH	II	725.152

Area	Class	Section
OTH	II	725.173
OTH	II	725.175
CL/PC	I	725.212
OTH	I	725.328

Area	Class	Section

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REMARKS

0510350004 - Fayette County - Vandalia Van/Tran Electric Corporation

Van Tran Electric Corporation is a manufacturer of 5 to 5000 KV transformers. The facility also operates a warranty repair shop for their transformers. The facility was initially inspected on June 3, 1985. During that inspection, a surface impoundment was discovered. The facility has a paint spray booth used to paint transformer parts. The solvent and paint waste was being placed into the impoundment. The pit was also determined to be contaminated with PCB's. Van Tran removed five 55 gallon drums of contaminated soil and backfilled the pit. Ongoing negotiations have been occurring to date with regards to the facility's voluntary closure/clean-up.

The facility is using xylene as the thinner associated with cleaning the paint guns and thinning the paint. The thinner used to clean the guns is poured back into the paint pails and re-used in the process. Per Van Tran's records, no waste solvent has been generated since June of 1986. The current waste on-site is approximately five gallons of spent solvent, five gallons of filter media used to reclaim spent solvent, and the five 55 gallon drums of contaminated soil that was excavated from the pit. The filter media is no longer generated because Van Tran switched from using solvent to wipe down transformers (to remove oil) to a biodegradable detergent. Mr. Parke told us that the waste in storage would not be removed until the clean-up was underway and would be shipped with waste generated from those activities. The drums are being stored in a locked building and secondary containment has been provided.

Twelve drums were generated during the site investigation conducted by Baker, TSA, and Envirodyne. These drums contain rinse water used to decontaminate sampling gear, disposable equipment and trash, i.e.; tyveks and gloves. These drums were handled by the site investigation contractors, and Van Tran is not handling them. These drums will also be removed when closure/clean activities begin.

Analysis of the wastes were reviewed, however, the analysis of the paint booth filters did not include a determination for ignitability. Mr. Parke told me the filters are no longer placed in the dumpster, but rather shipped to the Waco, Texas facility and disposed with the paint filters generated by that facility.

Van Tran has decided to shut down their Vandalia operations. Per Mr. Parke, shutdown is scheduled to take place around the second week of September, 1987. There were approximately ten employees still working at the facility. After shutdown, the equipment will be dismantled and shipped to one of the two other Van Tran facilities. Once this is completed, the facility will be closed. The only activities which will occur at the premises, after it is closed, will be the closure/clean-up activities. As a result of the facility closing, operating standards of interim status will not be applicable, i.e.; training of employees and operating records. The surface impoundment has not been RCRA closed and remains a regulated unit, however, since it has been backfilled, the requirements of Subpart K (Surface Impoundments) were not addressed. As a result of this inspection, the following apparent violations were observed.

1) 703.150 - Failure to submit Part A of the permit application.

2) 722.111 - Failure to demonstrate that the paint booth filters were analyzed for ignitability.

3) 725.114(c) - Failure to post danger signs around the surface impoundment.

4) 725.115 - Failure to develop a written inspection schedule for the safety and emergency equipment and failure to include time, and inspectors names on the drum inspection records.

5) 725.116 - Failure to establish and maintain a hazardous waste management training program and associated employee records, i.e.; job descriptions as related to hazardous wastes.

6) 725.137 - Failure to demonstrate that the appropriate arrangements with local authorities have been made.

7) 725.152 - The contingency plan does not contain specific procedures for emergencies related to hazardous waste arrangements with local authorities or an up-to-date list of emergency coordinators.

8) 725.173 - Failure to include the quantity and location of each hazardous waste at the facility.

9) 725.175 - Failure to file an annual report for calendar year 1986.

10) 725.212 - Failure to have a closure plan for the surface inpoundment and drum storage area.

11) 725.328 - Failure to remove all waste and contaminated soil from the surface impoundment as required.

MDG:jlr/0263L

WASTE DISPOSITION FORM

Facility Name: Van Tran Electric Corp. USEPA #: ILD981093628 IEPA #: 0510350004

Waste Name (Include haz & non-haz special & waste for which no determination has been made)	Generating Process (For waste gen. on site. N/A for TSD)	Date of Last Analysis	USEPA Haz Waste #	On 8700-12 *	On 3510-3 *	On Annual Rpt For 8_ *	8_ *	8_ *	Amount On Site	Rate of Generation	Last Manifested Shipment	Dispsition
	NO Hazardous waste Has Been Generated Since June 86.											
	All waste is stored on-site and will be shipped when closure/clean-up activities have been completed.											
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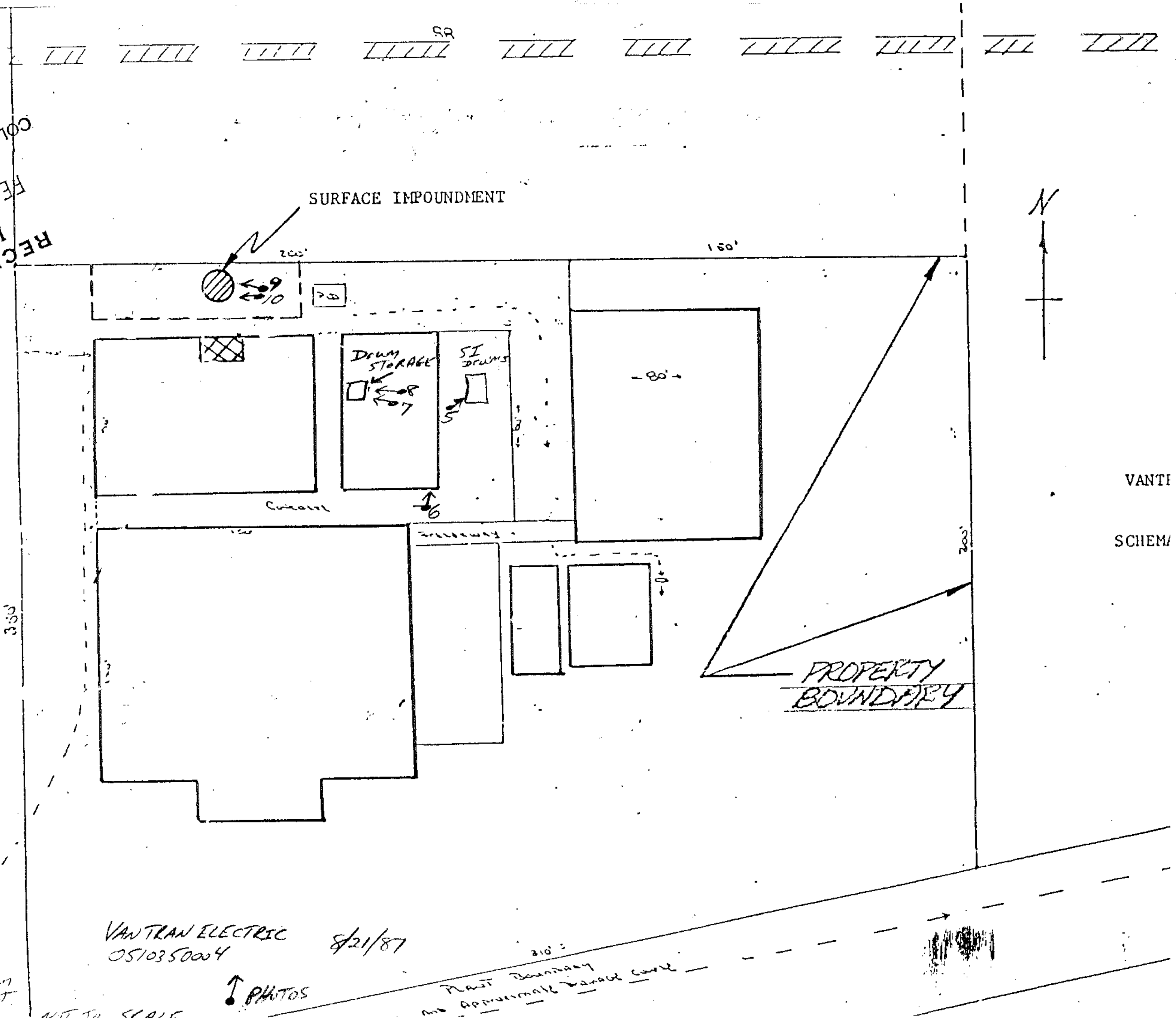
Paint Booth Filters	Filtering of overspray in Paint Booth	N/A Flashpoint Analysis NOT contacted	Unknown	N/A	N/A	N/A	N/A	N/A	Not Determined	8 Filters per week	None	Shipped to Waste Tech Supply & disposed of with
Xylene + Paint	Cleaning of Paint Guns at the end of the day	N/A	N/A	N/A	N/A	N/A	N/A	N/A	0	4 l gallon per day	N/A	the facilities filters. Re-used in next days paint.

* All "no" responses must be explained in the narrative



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Area	Cl	Day F/U Req	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				PART 722 GENERATOR STANDARDS Subpart A: General				
OTH	1		B, C, F, G, I, J	Section 722.111: Hazardous Waste Determination Has the generator determined if the solid waste it generates is a hazardous waste? Yes ___ No ___ Did the generator follow the procedures specified in this section in making its determination? Yes ___ No ___	---	X	AAA	Although analysis were provided for the paint booth filters the analysis did not include an ignitability determination. Paint booth filters are no longer thrown in trash dumpster but are taken to the Waco, Texas facility and disposed of with that facility's paint booth filters off-site Xylene used to clean paint guns is poured back into the paint buckets and re-used. (Xylene is also used to thin the paint). No spent solvent has been generated since June of 1986.
			B	Section 722.112: USEPA Identification Number	X	___		
			§ a)	Has the generator obtained a USEPA identification number? Yes X No ___				
			§ b)	Has the generator offered his hazardous waste only to transporters or to treatment, storage or disposal facilities that have received a USEPA identification number? Yes ___ No ___ N/A X				

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Area	Cl	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
				Part 703				Note: These questions relate only to facilities which do not qualify for interim status and who have not received an operating permit (Part B Permit).
				RCRA PERMIT PROGRAM				
			E,H, I,J	Subpart B Prohibitions				
OTH	1			Section 703.121 RCRA Permits		X		This violation is not being alleged but rather being covered by 703.150 (Failure to file a Part A) and 725.212 (Failure to have a Closure Plan).
			a)	Is any persons conducting any hazardous waste storage, hazardous waste treatment or hazardous waste disposal operation doing so only:				
				1) With a RCRA permit for the HWM facility? Yes ___ No ___				
				2) In conformance with all conditions imposed by the RCRA permit? Yes ___ No ___ N/A ___				
			b)	Do the owner and operator of hazardous waste management units have permits during the active life of the unit (including the closure period)? Yes ___ No ___				
			b)	Do the owners and operators of any hazardous waste unit which closed after January 26, 1982, have a permit during any post-closure period required under 35 Ill. Adm. Code 724.217 Post Closure Care and Use of Property and during any compliance period or any extension of that compliance period specified under 35 Ill. Adm. Code 724.196, Compliance Period? Yes ___ No ___ N/A ___				

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Area	Cl	90 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
				Part 703				
			E, H, I, J	RCRA PERMIT PROGRAM				
				Subpart C Authorization by Rule and Interim Status				
OTH	1			Section 703.150 Application by Existing HWM Facilities and Interim Status Qualifications	___	X	___	
			a)	Has the owner or operator of an existing HWM facility or of an HWM facility in existence on the effective date of satutory or regulatory amendments that render the facility subject to the requirement to have a RCRA permit submitted Part A of the permit application to the Agency no later than the following times, whichever comes first:				
				1) Six months after the date of publication of regulations which first require the owner or operator to comply with standards in 35 Ill. Adm. Code 725? Yes ___ No ___ N/A ___				
				2) Thirty days after the date the owner or operater first becomes subject to the standards in 35 Ill. Adm. Code 725? Yes ___ No ___ N/A ___				
				3) By March 27, 1987 for generators who generate more than 100 but less than 1000 kg of waste in a calendar month and treat, store or dispose of these wastes on-site? Yes ___ No ___ N/A ___				

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PER-C-1

Area	Cl	Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	1			Section 703.152 Amended Part A Application			X	
				Has the owner or operator of an HWM with interim status filed an amended Part A permit application with the Agency:				
			a)1)	1) No later than the effective date of revised regulations under 35 Ill. Adm. Code, 721, Identification and Listing of Hazardous Waste, listing or identifying additional hazardous waste which the HWM facility is handling? Yes ___ No ___ N/A ___				
			a)2)	2) As necessary to comply with the provisions of Section 703.155, Changes During Interim Status? Yes ___ No ___ N/A ___				
				Note: The owner or operator of a facility who fails to comply with the updating requirements of this section does not receive interim status as to the wastes not covered by duly filed Part A applications.				
OTH	1			Section 703.154 Prohibitions During Interim Status			X	
				During interim status has the facility refrained from:				
			a)	- Treating, storing or disposing of hazardous waste not specified in Part A of the permit application? Yes ___ No ___				

Area	Cl	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
			b)	- Employing processes not specified in Part A of the permit application? Yes ___ No ___				
			c)	- Exceeding the design capacities specified in Part A of the permit application? Yes ___ No ___				
OTH	1			Section 703.155 Changes During Interim Status	___	___	X	
			a) b) or c)	Note: Section 703.155 (a) (b) and (c) reiterate in more detail the requirement that a HWM facility submit and, in the case of (b) and (c) that the Agency approve, amendments to the Part A permit application prior to the facility conducting the activity or receiving new hazardous waste. A "No" answer to any of the questions under Section 703.154 means the facility is also in apparent non-compliance with this section.				
			d)	Did the owner or operator submit a revised Part A permit appication not later than 90 days prior to changes in operational control or ownership of the HWM facility? Yes ___ No ___ N/A ___				
				~~Section 703.156~~ Interim Status Standards	___	___		
OTH	1			Is the owner or operator complying with all interim status standards of 35 Ill. Adm. Code 725? Yes ___ No ___				
				Note: Complete the applicable portions of the TSD inspection form prior to answering the above questions.				

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Area	Cl	90 Day F/U	Key Ltr Sub Sec.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
				Part 725				
			E, H, I, J,	INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subpart A General Provisions				
OTH	1			Section 725.101 Purpose, Scope and Applicability	___	___	X	
			c) d)	Has the firm managed hazardous waste with the following hazardous waste numbers: F020, F021, F022, F023, F026 or F027 in compliance with the requirements of 725.101 (d)? Yes ___ No ±				
				Does the facility qualify for any of the exemptions listed in 725.101(c) Yes ___ No ___ If yes explain				

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Area	Cl	0 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES				
				Subpart B — General Facility Standards				
OTH	1			Section 725.111 — USEPA Identification Number	X			
				Has the facility obtained a USEPA identification number?				
				Section 725.112 — Required Notices			X	
			a)	Has the owner or operator of a facility that has arranged to receive hazardous waste from a foreign source notified the Regional Administrator, in writing, at least four weeks in advance of the date that the waste is expected to arrive at the facility? Yes ___ No ___ N/A X				
			b)	Before transferring ownership or operation of a facility during its operating life, or of a disposal facility during the post-closure care period; did the owner or operator notify the new owner or operator, in writing, of the requirements of 35 Ill. Adm. Code 702, 703 and 725? Yes ___ No ___ N/A X				
OTH	1			Section 725.113 — General Waste Analysis	X			
			a)1)	Has the owner or operator of the facility obtained a detailed chemical analysis of each waste prior to its treatment, storage or disposal? Yes X No ___				

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Area	Cl	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
			a)1)	Does the analysis contain all the information which must be known to treat, store or dispose of the waste in accordance with this Part? Yes X No ___				
				Has the analysis been repeated:				
			a)3)	A) When the operator is notified or has reason to believe that the process generating the hazardous waste has changed? Yes ___ No ___ N/A X				
			a)3)	B) By off-site facilities, when the results of the inspection required in Section 725.113 (a)(4) indicate that the hazardous waste received at the facility does not match the waste designated odn the accompanying manifest or shipping paper? Yes ___ No ___ N/A X				
			a)4)	Has the owner or operator of an off-site facility apparently inspected each hazardous waste movement received at the facility to determine whether it matches the identity of the waste specified on the accompanying manifest or shipping paper? Yes ___ No ___ N/A X				
			b)	Has the owner or operator developed a written waste analysis plan? Yes ___ No ___ N/A X				
			b)	Is the written waste analysis plan available at the facility? Yes ___ No ___ N/A X				
			b)	Does the owner or operator follow the procedures in the written plan so as to comply with the requirements in Section 725.113 (a)? Yes ___ No ___				

Facility is going to shut down operations. Waste on-site is in storage. No new waste is being generated or handled. All activities related to hazardous waste management are being addressed as part of the site closure/clean-up. Waste in container storage has been analyzed.

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Area	Cl	0 Day F/U	Key Ltr Sub Sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			b)	Does the plan specify: 1) The parameters for which each hazardous waste will be analyzed and the rationale for the selection of these parameters? Yes ___ No ___ 2) The test methods which will be used to test for those parameters? Yes ___ No ___ 3) The sampling method which will be used to obtain a representative sample of the waste to analyzed? Yes ___ No ___ 4) The frequency with which the initial analysis of the waste will be reviewed or repeated to ensure that the analysis is accurate and up-to-date? Yes ___ No ___ 5) For off-site facilities, the waste analyses that hazardous waste generators have agreed to supply? Yes ___ No ___ 6) The methods which will be used to meet the additional analysis requirements for specific waste managment methods as specified in Sections: - 725.293 (Tanks); - 725.325 (Surface Impoundments); - 725.352 (Waste Piles); - 725.373 (Land Treatment); - 725.414 (Incinerators); - 725.475 (Thermal Treatment); - 725.502 (Chem. Phys. Bio. Treat.) Yes ___ No ___ N/A ___				

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TSD-B-3

Area	Cl	May F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe.
				Note: Circle the specific waste management methods being employed.				
			c)	For off-site facilities, does the plan:				
				1) Describe the procedures which will be used to determine the identity of each movement of waste managed at the facility? Yes ___ No ___ N/A X				
				2) Describe the sampling methods which will be used to obtain a representative sample of the waste to be identified, if the identification method includes sampling? Yes ___ No ___ N/A X				
OTH	1	X		Section 725.114 Security Does the facility qualify for the exemption to the requirement to provide security provided in Section 725.114 (a)? Yes ___ No X	___	X	___	No signs around fenced impoundment.
			b)1)	Does a non-exempt facility have either:				
				1) A 24-hour surveillance system which continuously monitors and controls entry into the active portion of the facility? Yes ___ No X				
				or 2) An artificial or natural barrier which completely surrounds the active portion of the facility and a means to control entry at all times thru the gate(s) or other entries to the active portion of the facility? Yes X No ___				

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Area	Cl	0 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
			c)	Does a non-exempt facility have a sign, legible from a distance of at least 25 feet, with the words "Danger - Unauthorized Personnel Keep Out" at each entrance to the active portion of the facility and at other locations in sufficient numbers to be seen from any approach to the active portion? Yes ___ No X Note: Existing signs with legends other than the one above may be used if the legend on the sign indicates only authorized personnel are allowed to enter the active portion and that entry onto the active portion can be dangerous.				

Area	Cl	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
OTH	2			Section 725.115 General Inspection Requirements	___	X		
			a)	Does the owner or operator inspect the facility for malfunctions, deterioration, operator errors and discharges which are causing or may lead to:				
				Release of hazardous waste or hazardous waste constituents to the environment; or				
				threat to human health? Yes X No ___				
			a)	Does the owner or operator conduct these inspections often enough to identify problems in time to correct them before they harm human health or the environment? Yes X No ___				
			b)1)	Has the owner or operator developed a written schedule for inspecting all monitoring equipment, safety and emergency equipment, security devices and operating and structural equipment important to preventing, detecting or responding to environmental or human health hazards? Yes ___ No X				N.A. for Safety & Emergency Equipment.
			b)2)	Is the written schedule at the facility? Yes X No ___ ~~Items this to Section 725.116~~				For container storage inspections.
			b)3)	Does the schedule identify the types of problems which are to be looked for during the inspection? Yes X No ___				
			b)4)	Does the schedule specify at least the following minimum inspection frequency:				

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Area	Cl	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
				- Daily inspections of areas subject to spills? Yes ___ No ___ N/A X - The items and frequencies, where applicable, called for in Sections: (725.274) (Containers); - 725.294 (Tanks); - 725.326 (Surface Impoundments); - 725.447 (Incinerators); - 725.477 (Thermal Treatment); - 725.503 (Chem. Phys. Bio. Treat.) Yes X No ___ N/A ___ Note: Circle the applicable section.				
			c)	Has the owner or operator remedied any deterioration or malfunction of equipment or structures which the inspections reveal on a schedule which ensures that the problem does not lead to an environmental or human health hazard? Yes X No ___				
			c)	Where a hazard is imminent or has already occurred, has the owner or operator taken immediate action to resolve the problem? Yes X No ___ N/A ___ Since inspection records have been established				
			d)	Does the owner or operator record the results of inspections in a log or summary? Yes X No ___ For Drums.				
			d)	Does the inspection record include: - The date and time of the inspection? Yes ___ No X - The name of the inspector? Yes ___ No X				

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Area	Cl	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				- A notation of the observations made? Yes X No ___				
				- The date and nature of any type of corrective action? Yes X No ___, N/A ___				
OTH	2			Section 725.116 Personnel Training Does the facility have a training program	___	X		If no skip to 725.117
			a)1)	Have facility personnel who are involved with hazardous waste managment successfully completed a program of classroom or on-the-job training that teaches them to perform their duties in a way that ensures the facility's compliance with the requirements of this Part? Yes ___ No X				Training program does not cover hazardous waste procedures. Although it does cover handling of solvent products.
			a)1)	Is the training program formalized, i.e. written down? Yes X No ___				
			a)2)	Is the program directed by a person who has been trained in hazardous waste management procedures? Yes ___ No X				
			a)3)	Does the program cover, at a minimum:				
				A) Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment? Yes ___ No X N/A ___				
				B) Key parameters for automatic waste feed cutoff systems? Yes ___ No ___ N/A X				
				C) Communications or alarm systems? Yes X No ___ N/A ___				
				D) Response to fire or explosion? Yes X No ___ N/A ___				

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Area	Cl	90 day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
				4) Records to document that the training or job experience have been given to and completed by personnel dealing with hazardous wastes management? Yes ___ No X				
			e)	Is the facility maintaining training records of former employees who were involved in hazardous waste management for a period of at least three years? Yes ___ No ___ N/A X				Hazardous waste training program records have not been established
OTH	1	X		Section 725.117 General Requirements for Ignitable, Reactive or Incompatible Wastes	X			
			a)	Are ignitable and reactive wastes protected from and separated from sources of ignition and reaction? Yes X No ___				
			a)	Are smoking and open flames restricted to specially designated areas when ignitable or reactive waste is being handled? Yes ___ No X				
			a)	Are "No Smoking" signs posted whenever there is a hazard from ignitable or reactive waste? Yes ___ No ___				
			b)	Is the treatment, storage or disposal of ignitable or reactive waste and the mixture or comingling of incompatible wastes and materials being done so that it does not:				
				1) Generate extreme heat or pressure, fire, or explosion or violent reaction? Yes X No ___				

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Area	Cl	90 day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				E) Response to ground water contamination incidents? Yes ___ No ___ N/A X				
			a)3)	Does the program cover the implementation of the contingency plan? Yes ___ No X				Contingency Plan does not specifically address hazardous waste.
			b)	Have new employees completed the program within six months of the date of employment or assignment to a position requiring them to manage hazardous waste? Yes ___ No ___ N/A X				
			c)	Has the facility conducted an annual review of the initial training? Yes ___ No ___ N/A X				
			d)	Are the following documents and records being maintained at the facility:				
				1) The job title for each position related to the management of hazardous waste and the name(s) of the employee(s) filling each job? Yes ___ No X				Training records not designed for hazardous waste management.
				2) A written job description for each job position above, to include the requisite skill, education or other qualifications and duties of personnel assigned to each position? Yes ___ No X				
				3) A written description of the type and amount of both initial and continuing training that will be given to each person holding a position dealing with hazardous waste management? Yes ___ No X				

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Area	Cl	O Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe.
				2) Produce uncontrolled toxic mists, fumes, dusts or gases in sufficient quantities to threaten human health? Yes X No ___				
				3) Produce uncontrolled flammable fumes or gases in sufficient quantities to pose a risk of fire or explosion? Yes X No ___				
				4) Damage the structural integrity of the device or facility containing the waste? Yes X No ___				
				5) Through other like means threaten human health or the environment? Yes X No ___				
				Section 725.118 Location Standards	NA		X	
				Has the facility placed hazardous waste in a salt dome, salt bed formation, underground mine or cave after July 11, 1986? Yes ___ No ___ N/A				
				Note: A "Yes" answer is a violation of the location standard.				

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Area	C	90 Day F/U	Key Ltr	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb.
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart C Preparedness and Prevention				
OTH	1	X		Section 725.131 Maintenance and Operation of Facility	X			for current operations at the facility. Past areas of contamination still exist. Being handled via a voluntary clean-up.
				Is the facility being maintained and operated to minimize the possibility of a fire, explosion or any unplanned and sudden or non-sudden release of hazardous waste or hazardous waste constituents to: - Air - Soil, or - Surface water, which would threaten human health or the environment? Yes X No ___				
OTH	1	X		Section 725.132 Required Equipment	X			
				Is the facility equipped with the following, unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment:				
			a)	- An internal communications or alarm system capable of providing immediate emergency instructions? Yes X No ___ N/A ___				

Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
			b)	- A device such as a telephone (immediately available at the scene of operations) capable of summoning emergency assistance from local police or fire departments or State or local emergency response teams? Yes X No ___ N/A ___				
			c)	- Portable fire extinguishers, fire control equiment, spill control equipment and decontamination equipment? Yes X No ___ N/A ___				
			d)	- Water at adequate volume and pressure to supply water hose streams or foam producing equipment or automatic sprinklers or water spray systems? Yes X No ___ N/A ___ Note: Any "N/A" answers must be explained in the Remarks column.				
OTH	1	X		Section 725.133 Testing and Maintenance of Equipment Where required, is the facility testing and maintaining, as necessary, to assure proper operation in time of emergency: - Communications/alarm systems? Yes X No ___ N/A ___ - Fire protection equipment? Yes X No ___ N/A ___ - Spill control equipment? Yes ___ No ___ N/A X - Decontamination equipment? Yes ___ No ___ N/A X	X	___		

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Area	C	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
				Note: Any "N/A" answer must be explained in the Comments.				
OTH	1	X		Section 725.134 Access To Communications Or Alarm Systems	X			
			a)	Do all personnel involved in handling hazardous waste have immediate access to an internal alarm or emergency communication device, either directly or thru visual or voice contact with another employee, unless not required under Section 725.132? Yes ___ No ___ N/A X				Access is provided however no hazardous waste is handled/stored in container.
			b)	If there is ever just one employee on the premises while the facility is operating, does he have immediate access to a device, such as a telephone, capable of summoning external emergency assistance, unless such a device is not required under Section 725.132? Yes ___ No ___ N/A X				
OTH	1	X		Section 725.135 Required Aisle Space	X		—	
				Is the owner or operator maintaining sufficient aisle space to allow the unobstructed movement of personnel, fire equipment and decontamination equipment to any area of the facility? Yes ~~No~~ N/A				
OTH	2			Section 725.137 Arrangements with Local Authorities		X		
				Has the owner or operator made or attempted to make the following arrangements, as appropriate for the type of waste handled at his facility and the potential need for the services of these organizations:				

Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe.
			a)1)	1)-Arrangements to familiarize police and fire departments and emergency response teams with the layout of the facility, properties of hazardous wastes handled at the facility and associated hazards, places where personnel would normally be working, entrances to roads inside the facility and possible evactuation routes? Yes ___ No X N/A ___				
			a)2)	2) Where more than one police or fire department might respond to an emergency, has one been designated as the primary emergency authority with the others agreeing to provide support to the the primary emergency authority? Yes ___ No ___ N/A X				
			a)3)	3) Agreements with State emergency response teams, emergency response contractors and equipment suppliers? Yes ___ No X N/A ___				
			a)4)	4) Arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and the types of injuries or illnesses which could result from fires, explosions or releases at the facility? Yes ___ No X N/A ___ Note: Any "N/A" answer must be explained in the comments.				
			b)	Has the owner or operator documented; in the operating record, refusal of State or local authorities to enter into any or all of the above arrangements? Yes ___ No ___ N/A X				

Area	CI	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart D Contingency Plan and Emergency Procedures				
OTH	1			Section 725.151 Purpose and Implementation of Contingency Plan Is a plan available Yes__ No__ note, if no skip to Section 725.155 Emergency Coordinator	X			
			a)	Is the plan designed to minimize hazards to human health or the environment from fires, explosions or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface waters? Yes X No ___				Plan established for hazardous materials does not address specifics of waste in storage however product and wastes are solvents.
			b)	Have the provisions of the plan been carried out immediately whenever there was a fire, explosion or release of hazardous waste constituents which could threaten human health or the environment? Yes ___ No ___ N/A X				
OTH	2			Section 725.152 Content of Contingency Plan	___	X		Emergency Plan established for Hazardous materials & contains elements for a haz. waste Contingency Plan.
			a)	Does the plan describe the actions facility personnel must take to comply with Sections 725.151 and 725.156 in response to: 1) Fires. Yes X No ___ 2) Explosions. Yes X No ___ 3) Unplanned sudden or non-sudden releases of hazardous waste or hazardous waste constituents to air, soil or surface water? Yes__ No X				Hazardous constituents not specifics of waste in storage.

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Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			c)	Does the plan describe the arrangements agreed to by:				
				1) Local police and fire departments? Yes ___ No X				
				2) Hospitals? Yes ___ No X				
				3) Contractors? Yes ___ No X				
				4) State and local emergency response teams? Yes ___ No X				
			d)	Does the plan list the names, addresses and phone number (office and home) of all personnel qualified to act as emergency coordinators? Yes ___ No X				
			d)	Is the list of emergency coordinators up-to-date? Yes ___ No X				
			d)	If more than one person is designated as an emergency coordinator is a primary coordinator identified? Yes X No ___				
			e)	Does the Plan identify: A list and physical description of				
				1) All emergency equipment at the facility, ~~to include a physical description of the equipment~~? Yes X No ___				
				2) A brief outline of the capability of each piece of emergency equipment? Yes X No ___				
				3) The location of each piece of emergency equipment? Yes X No ___				
			e)	Is the list of emergency equipment up-to-date? Yes X No ___				

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Area	C.	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			f)	Does the plan include an evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? Yes X No ___ N/A ___				
			f)	Does the plan identify the signal to be used to begin evacutation? Yes X No ___				
			f)	Are alternate evacuation routes identified? Yes ___ No ___ N/A X				
OTH	2			Section 725.153 Copies of Contingency Plan	___	___	X	
				Has a copy (and all revisions) of the contingency plan:				
			a)	a) Been maintained at the facility? Yes ___ No ___				
			b)	b) Been submitted to all local police and fire departments, hospitals, and State and local emergency response teams that may be called upon to provide emergency service? Yes ___ No ___				
OTH	2			Section 725.154 Amendment of Contingency Plan	___	___	X	
				Has the contingency plan been reviewed, and if necessary, amended whenever:				
			a)	1) Applicable regulations are revised? Yes ___ No ___				
			b)	2) The plan fails in an emergency? Yes ___ No ___ N/A ___				

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Area	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numb
		c)	3) The facility changes - in its design, construction, operation, maintenance or other circumstances - in a way that materially increases the potential for fires, explosions, or releases of hazardous waste or hazardous waste constituents or changes the response necessary in an emergency? Yes ___ No ___ N/A ___				
		d)	4) The list of emergency coordinators changes? Yes __ No ___				
		e)	5) The list of emergency equipement changes? Yes ___ No ___				
OTH	2		Section 725.155 Emergency Coordinator	X	___	___	Emergency Coordinators are listed however one of them listed no longer employed, however primary and first alternate coordinators are still available
			Is there an emergency coordinator on site or on call at all times? Yes X No___				
			Is there an emergency coordinator familiar with all aspects of the contingency plan, all operations and activities at the facility, the location and characteristics of the wastes handled, the location of all records in the facility and the facility layout? Yes X No ___				
			Does the coordinator have the authority to commit the resources to carry out the contingency plan? Yes X No ___				
OTH	1 or 2		Section 725.156 Emergency Procedures	___	___	X	However, not from a spill of hazardous waste. Placement of waste in a surface impoundment
			Has the facility had a release, fire or explosion? Yes X No ___				

Area	C	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				Note: ~~If the answer is "No" check N/A.~~ If the answer is "Yes", explain in detail the incident and how the facility did or did not follow the procedures prescribed in this section. Review the requirements while completing the explanation. If the company failed to meet one or more of the requirements, check "No" in the Apparent Compliance column.				

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Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart E Manifest System, Recordkeeping and Reporting				
OTH	1			Section 725.171 Use of Manifest System	___	___	X	No off-site waste accepted.
				Does the facility accept waste from off-site? Yes ___ No ___ Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A". → Skip to Section 725.173 For each manifest reviewed, did the facility:				
			a)1)	1) Sign and date each copy to certify that the hazardous waste covered by the manifest was received? Yes ___ No ___				
			a)2)	2) Note any significant discrepancies in the manifest or each copy of the manifest? Yes ___ No ___ N/A ___				
			a)3)	3) Immediately give one copy of the completed manifest to the transporter? Yes ___ No				
			a)4)	4) Within 30 days after delivery, send one copy of the manifest to the generator and one copy to the Agency? Yes ___ No ___				

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Area	C	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			a)5)	5) Retain a copy of the manifest at the facility for a period of three years from the date of delivery of the waste? Yes ___ No ___				
			b)	Has the facility followed the procedures prescribed in 725.171 (b) for rail or water (bulk shipments) of hazardous waste? Yes ___ No ___ Does the facility initiate shipments of hazardous waste? Yes ___ No ___ Note: If the answer is "Yes", the facility is also a generator of hazardous waste. Complete the generator checklist.				
				Section 725.172 Manifest Discrepancies				
				~~Does the facility accept hazardous waste from off-site? Yes No~~ ~~Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A".~~ note if no manifest discrepancies check N/A and skip to 725.173				
			d)	Has the owner or operator attempted to resolve significant discrepancies in quantity or type (i.e. variations in weight of 10% or more, variations in piece count of one container per truckload, obvious differences which can be discovered by inspection or waste analysis such as waste solvent substituted for waste acid) upon their discovery? Yes ___ No ___				
			d)	If the discrepancy is not resolved within 15 days after receiving the waste, has the				

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Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				owner or operator submitted to the Agency a letter describing the discrepancy and the attempts made to reconcile it and a copy of the manifest or shipping paper at issue? Yes ___ No ___				
OTH	2			Section 725.173 Operating Record	___	X		
			a)	Does the owner or operator have a written operating record at the facility? Yes X No ___				
			b)	Is the information in the operating record being maintained until closure of the facility? Yes X No ___				
				Does the operating record contain the following information?				
			b)1)	1) A description of and quantity of each hazardous waste received at the TSD facility (whether from on or off-site generation)? Yes ___ No ___ N/A X				Hazardous waste no longer placed in Surface Impoundment or drums. (No waste placed in storage since June of 1986)
			b)1)	2) A record of the method(s) and date(s) of its treatment, storage, or disposal as required by Appendix I? Yes X No ___				
			b)2)	3) The location of each hazardous waste within the facility? Yes ___ No X				Although quantities and locations are known they are not documented.
			b)2)	4) The quantity of each hazardous waste at each location within the facility? Yes ___ No X				
			b)2)	5) For disposal facilities, a map recording the location and quantity of hazardous waste in each cell or disposal area? Yes ___ No ___ N/A X				

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Area	90 Day F/U	Key Ltr Sub-	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
		b)2)	6) A cross reference by manifest number to location and quantity of hazardous waste? Yes ___ No ___ N/A X				
		b)3)	7) Records and results of waste analyses and trial test performed as specified in Sections:				
			- 725.113 (Gen. Waste Analysis) Yes X No ___				
			- 725.293 (Tanks) Yes ___ No ___ N/A X				
			- 725.325 (Surface Improvements) Yes ___ No ___ N/A X				
			- 725.352 (Waste Piles) Yes ___ No ___ N/A X				
			- 725.373 (Land Treatment) Yes ___ No ___ N/A X				
			- 725.441 (Incinerators) Yes ___ No ___ N/A X				
			- 725.475 (Thermal Treatment) Yes ___ No ___ N/A X				
			- 725.502 (Chem., Phys., Bio. Treatment) Yes ___ No ___ N/A X				
		b)4)	8) Summary reports and details of all incidents that require the implementation of the contingency plan as specified in Section 725.156(j)? Yes ___ No ___ N/A X				
		b)5)	9) Records and results of inspections as required by Section 725.115(d)? Yes X No ___				

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Area	Cl	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Note: The above information on inspection records need only be kept for three years. This period would automatically be extended during any unresolved enforcement action.				
			b)6)	10. Monitoring, testing or analytical data where required by Sections: - 725.190 (G.W. Monitoring) Yes__ No__ N/A X - 725.194 (G.W. Monitoring) Yes__ No__ N/A X - 725.376 (Land Treatment) Yes__ No__ N/A X - 725.378 (Land Treatment) Yes__ No__ N/A X - 725.380 (d)(1) (Land Treatment) Yes__ No__ N/A X - 725.447 (Incinerators) Yes__ No__ N/A X - 725.477 (Thermal Treatment) Yes__ No__ N/A X				Ground water program in the process of being implemented.
				Note: Data required under 725.194 must be kept thoughout the post-closure period.				
			b)7)	11) All closure cost estimates required by Section 725.242? Yes ___ No X N/A___				Closure being negotiated through SITE investigation.
			b)7)	12) All post-closure cost estimates for disposal facilities required for Section 725-244? Yes __ No X N/A___				

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Area	C.	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
OTH	2			Section 725.174 Availability, Retention and Disposition of Records	X			
			a)	During the inspection were all ~~[illegible]~~ records, including plans, required under this Part furnished upon request and made available at all reasonable times for inspection as required by this Section? Yes X No ___				
			b)	Upon closure of a waste disposal facility did the owner or operator submit a copy of the record of waste disposal location(s) and quantities to: - The Agency? Yes ___ No ___ N/A X - The local land authority? Yes ___ No ___ N/A X				
			c)	Are all required records being maintained and retained during the course of any unresolved enforcement action or as requested by the Director? Yes___ No___ N/A X				
OTH	2			Section 725.175 Annual Report		X		
				Has the owner or operator prepared and submitted a copy of ~~an~~ a facility annual report, supplied by the Agency, to the Agency by March 1 for the preceding calendar year? ~~Yes / No N/A~~ of each facility each year				

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Area	C.	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
OTH	1			Section 725.176 Unmanifested Waste Report			X	

Does the facility accept hazardous waste from off-site ? Yes ___ No ___

Note: If the answer is "Yes", complete this section. If the answer is "No", check "N/A" * Skip to 725.177

Has the facility accepted hazaradous waste from an off-site source for treatment, storage or disposal without an accompanying manifest for shipping paper? Yes ___ No ___

Was the hazardous waste accepted without the manifest or shipping paper exempt from the manifesting requirement by 35 Ill. Adm. Code 721.105? Yes ___ No ___

Note: If the answer to both the above questions is "Yes" check "N/A". If the answer to the first question is "Yes" and the second "No", answer the following questions:

Did the owner or operator complete an unmanifested waste report to include the information required in Section 725.176(a) thru (g)? Yes ___ No ___

Did the owner or operator submit the unmanifested waste report to the Agency within 15 days of receiving the waste? Yes ___ No ___

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Area	Cl	30 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
OTH	2			Section 725.177 Additional Reports			X	
				Has the owner or operator submitted to the Agency, as required, reports concerning:				
			a)	1) Releases, fires, explosions as specified in Section 725.156? Yes ___ No ___ N/A X				
			b)	2) Groundwater contamination and monitoring data as specified in Sections 725.193 and 725.194? Yes X No ___ N/A ___				
			c)	3) Facility closure as specified in Section 725.215? Yes ___ No ___ N/A X				

Area	Cl	F/U	Key Ltr Sub-Sect.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subparts G & H — Closure, Post-Closure and Financial Requirements				
CLO	1			Section 725.212 — Closure Plan	—	X	N/A	
			a)	Was the most current facility closure plan available during the inspection? Yes — No X				Closure Plan and implementation currently part of negotiations under the voluntary clean-up agreement.
			d)	Was the closure plan submitted to the Agency within the time frames specified below: — At least 180 days prior to the date closure of the first surface impoundment, waste pile, land treatment or landfill unit was (is) expected to begin? Yes — No — N/A — — At least 180 days prior to the date of final closure of a facility with surface impoundment(s), waste pile(s), land treatment or landfill unit(s)? yes — No — N/A — — At least 45 days prior to the date of final closure of a facility with only tank(s), container storage or in-				

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Area	Cl	Key Ltr Sub-Sec.	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
			cinerator unit(s)? Yes — No — N/A —				
			— At least 60 days prior to the date closure is expected to begin at a facility with a surface impoundment, waste pile, land fill or land treatment unit which also has an approved closure plan? Yes — No — N/A —				
			— No later than 15 days after termination of interim status (unless a full operating permit was issued simultaneously)? Yes — No — N/A —				
			— No later than 15 days after issuance of a judicial decree or Board order to cease receiving hazardous waste or close? Yes — No — N/A —				
CLO	1		Section 725.218 Post Closure Plan	—	—	X	Determination as to applicability of Post Closure has not been made
		b)	Was the most current facility post-closure plan available during the inspection? yes — No —				
		e)	Was the post-closure plan submitted to the Agency within the time frames established in this subsection? Yes — No — N/A —				

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Area	Cl	0 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
FIN	1			Section 725.242 Cost Estimate For [redacted] Closure Has the facility prepared a written estimate of the cost ~~of closing the facility in accordance with the closure plan as specified in Section 725.212?~~ for closure. ~~Yes / No~~			✓	
FIN	1			Section 725.244 Cost Estimate For Post-Closure Care Has the facility prepared a written estimate of the annual cost of post-closure monitoring and maintenance of the facility?			✓	

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Area	C.	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILITIES Subpart I Use and Management of Container				
OTH	1	X		Section 725.271 Condition of Containers	X			
				Has the owner or operator transferred the hazardous waste in leaking container or containers which are not in good condition or managing the waste in some other way that complies with the requirements of this Part? Yes ~~No~~ ~~N/A~~				
OTH	1	X		Section 725.272 Compatibility of Waste with Container	X			
				Is the owner or operator using containers made of or lined with materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired? Yes ~~No~~				
OTH	1	X		Section 725.273 Management of Containers	X			
			a)	Are containers of hazardous waste always closed during storage? Yes X No ___				

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Area	Ca	90 Day F/U	Key Ltr Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Numbe
			b)	Are containers of hazardous waste being opened, handled or stored in manner which will prevent the rupture of the container or prevent it from leaking? Yes ___ No ___				
OTH	2			Section 725.274 Inspections	X			
				Is the owner or operator inspecting areas where the containers are stored at least weekly, looking for leaks and for deterioration caused by corrosion or other factors? Yes X No ___				
				Note: Any evidence of leakage may be a reason to answer "No" to the above question, even if there are inspection records that indicate that inspections are being done.				
				Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc. to determine if inspections are actually being done.				
OTH	1	X		Section 725.276 Special Requirements for Ignitable or Reactive Wastes	X			
				Are containers holding ignitable or reactibe waste located at least 50 feet from the property line? Yes No				
OTH	1	X		Section 725.277 Special Requirements for Incompatible Wastes			X	
				Is the owner complying with the requirements concerning the management of incompatible wastes or incompatible wastes and materials contained in this Section? Yes No				

Area	C.	90 Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				Part 725 INTERIM STATUS STANDARDS FOR OWNERS AND OPERATORS OF HAZARDOUS WASTE TREATMENT, STORAGE AND DISPOSAL FACILTIES				
				Subpart K: Surface Impoundments				
OTH	1	X		Section 725.321 Design Requirements	____	____	X	Surface Impoundment has been excavated partially and backfilled. Requirements as to the proper closure of the impoundment is being tracked by Section 725.212 & 725.328. Since an actual impoundment no longer exists the requirements of this section can be completed. See Next Page
			a)	Has the owner or operator met the requirements for liners and leachate collection systems in accordance with 35 Ill. Adm. Code 724.321(c) for each new unit, or lateral expansion of an existing unit that is within the area identified in the facility Part A permit application? Yes _____ No _____ N/A _____				
				Note: If "N/A" is checked, provide a detailed explanation of why the site is not subject to the requirements, or why the requirements have been waived by the Agency pursuant to 725.321 (c) or (d).				
			a)	Did the owner or operator meet the above requirement for waste received after May 8, 1985? Yes _____ No _____				
			b)	Has the owner or operator notified the Agency, in writing, at least 60 days prior to receiving waste? Yes _____ No _____				
			b)	Did the owner or operator submit a Part B Permit application within six months of the Agency's receipt of notification? Yes _____ No _____				

Area	Cl	Day F/U	Key Ltr / Sub-sec	Requirement	In Apparent Compliance? Yes	No	N/A	Remarks or Comment Number
				records that indicate that inspections are being done. Review the responses in Section 725.115, General Inspection Requirements, the frequency of inspections, the date of the last inspection, etc, to determine if inspections are actually being done.				
CLO	1			Section 725.328 Closure	___	X	___	
			b)	Has the owner or operator removed from the impoundment: 1) standing liquids, 2) waste and waste residues, 3) the liner, if any and 4) underlying and surrounding contaminated soil? Yes___ No X N/A___				Five drums of soil were removed from the impoundment however soil borings still show contamination.
			b)	Has the owner or operator demonstrated that, at any stage of removal, the remaining materials in the impoundment are not hazardous wastes per Section 721.103 (c) and (d)? Yes ___ No X N/A ___				
			c)	Has the owner or operator closed the impoundment and provided post-closure care as for a landfill under Subpart G and Section 725.410? Yes ___ No___ N/A X				Further Impoundment closure and cleanup is scheduled to take place
				Note: Determine compliance or non-compliance with this Section only in conjunction with a closure verification inspection conducted after the facility and its independent registered professional engineer have certifed closure in accordance with an approved closure plan.				
OTH	1			Section 725.329 Special Requirements for Ignitable or Reactive Wastes	___	___	___	

DATE: August 21, 1987

TIME: 11:15 a.m.

I.D. 0510350004

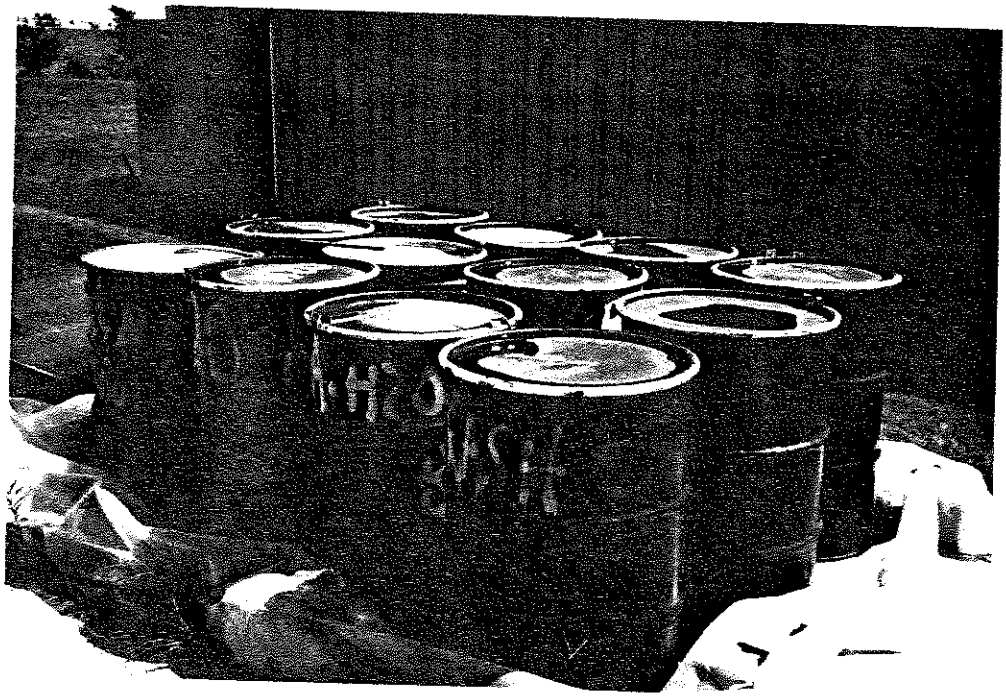
Fayette County

Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

ROLL# 721 PHOTO# 5

PHOTOGRAPH BY:



DATE: August 21, 1987

TIME: 11:16 a.m.

I.D. 0510350004

Fayette County

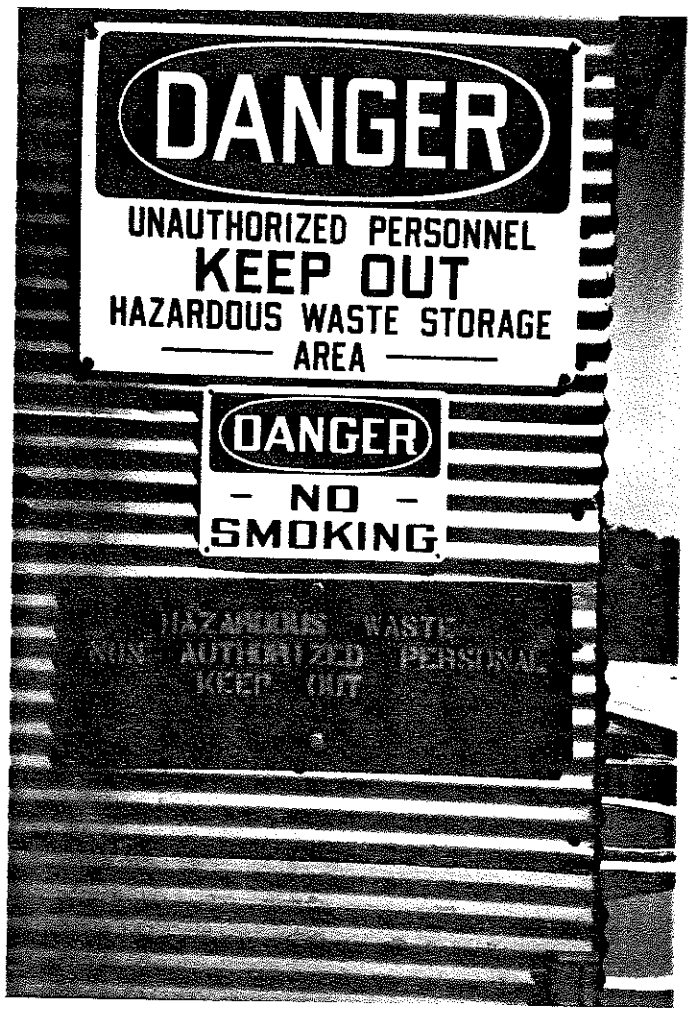
Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

North

ROLL# 721 PHOTO# 6

PHOTOGRAPH BY:



DATE: August 21, 1987

TIME: 11:17 a.m.

I.D. 0510350004

Fayette County

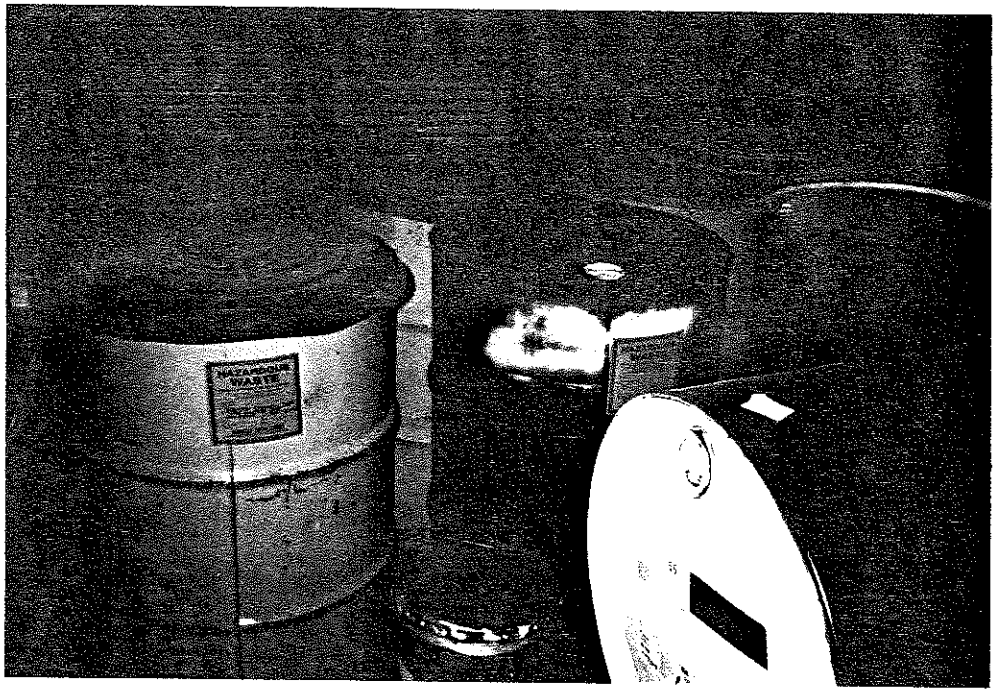
Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 721 PHOTO# 7

PHOTOGRAPH BY:



DATE: August 21, 1987

TIME: 11:18 a.m.

I.D. 0510350004

Fayette County

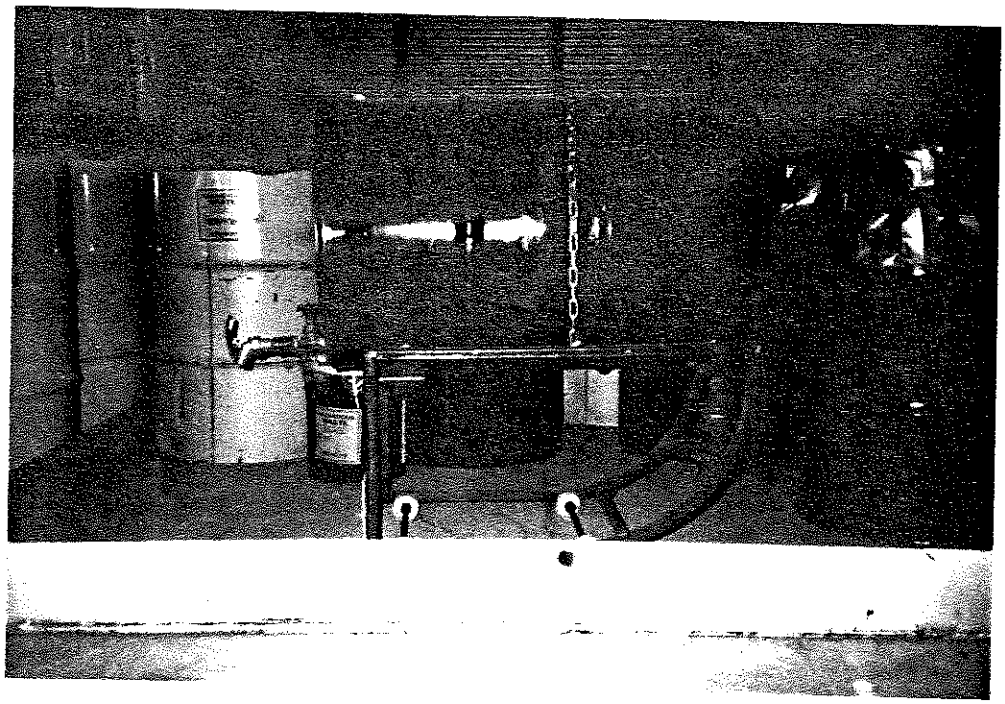
Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

West

ROLL# 721 PHOTO# 8

PHOTOGRAPH BY:



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DATE: August 21, 1987

TIME: 11:19 a.m.

I.D. 0510350004

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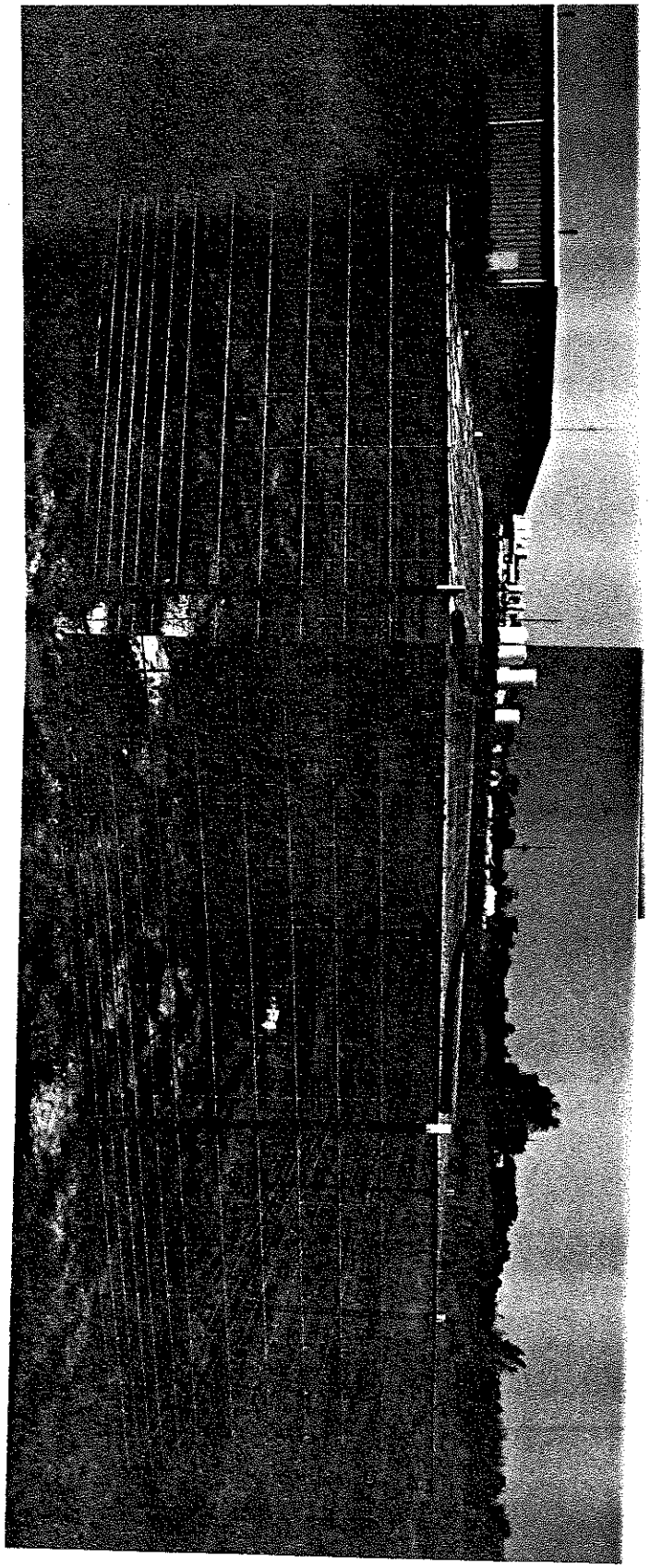
PHOTOGRAPH TAKEN TOWARD THE:

West Southwest

ROLL# 721 PHOTO# 9

PHOTOGRAPH BY:



DATE: August 21, 1987

TIME: 11:19 a.m.

I.D. 0510350004

Fayette County

Vandalia/Van Tran

PHOTOGRAPH TAKEN TOWARD THE:

West Northwest

ROLL# 721 PHOTO# 10

PHOTOGRAPH BY:

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APPENDIX A-1

FACILITY INSPECTION FORM FOR COMPLIANCE WITH INTERIM STATUS STANDARDS COVERING GROUNDWATER MONITORING

General Information

USEPA Number: ILD981093628 IEPA Number: 0510350004

~~Major~~ LDF Facility: (YES)/NO Notified As: G (Small Q) Regulated As: G/TSD

Facility Name: VAN TRAN ELECTRIC CORP.

Street: 1505 VAN TRAN AVENUE

City: VANDALIA State: ILLINOIS Zip Code: 62471

Phone: (618) 283-3220 County: FAYETTE

Facility Contact Official: Bob Smith Branch/Organization: VAN TRAN

Title: Plant Supervisor

Region: S Date of Inspection: 7/23/87 Time: (From) 12:50 pm (To) 3:20 pm

Type of Inspection: (GWM) RR F/U ___/___/___ (Date of Initial Inspection)

Preparer Information:

Name: Charles Reeter

Agency/Title: IEPA - EPS GWM Coordinator

Telephone: (618) 345-4606

Section		Class I	Class II
725.190		1	
725.191	And all	1	
725.192	Subparts	1	
725.193	Therein	1	
725.194		1	
TOTAL Class I's & II's		5	

Type of facility: (check appropriately)

	YES	NO	UNKNOWN	WAVIED
a) surface impoundment				
b) landfill				
c) land treatment facility				
d) disposal waste pile*				

Groundwater Monitoring Program

1. Was the groundwater monitoring program reviewed prior to site visit? if "NO",			Currently, No RCRA GWM Program exists at the facility.	
a) Was the groundwater program reviewed at the facility prior to site inspection?				
2. Has a groundwater monitoring program (capable of determining the facility's impact on the quality of groundwater in the uppermost aquifer underlying the facility) been implemented? 725.190(a)		X		

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*Listed separate from landfill for convenience of identification.

Refer to the attached comments.

The RCRA Subpart F groundwater regulations were discussed at length with the Van Tran representatives, and it was suggested to Mr. Parke that he obtain a copy of the USEPA Groundwater Technical Enforcement Guidance Document (TEGD) for future reference. A copy of the Agency well construction diagram was given to Mr. Parke. Much of the work done for the Remedial Investigation, such as soil and geologic studies, aquifer characterization, well installation, etc. could be used for the preparation of a RCRA groundwater monitoring plan. However, not all of the apparent violations of regulations would be resolved, because many of the requirements would not be fulfilled. For instance, although 8 wells currently exist at the facility, 3 are not located immediately adjacent to the waste management (pit) boundary, as required by the regulations. Nor have the wells been sampled for background analyses or any organic constituents other than PCB's, which were found at the facility in the soil and waste (Benzene, Toluene, Xylene, Alcohols, MEK, etc.)

Since groundwater flow at the facility was established from only 1 measurement of the water levels in the original 4 perimeter wells installed in 1985, I strongly recommended that Van Tran take periodic measurements of the water levels in the 8 wells at the facility either once every 2 weeks or monthly. Accurate groundwater flow information would be needed to be able to meet the RCRA Subpart F requirements of 1 upgradient and 3 downgradient wells, adjacent to the disposal pit.

The inspection checklist was explained to Mr. Parke and a "blank" one was given to him to use as a guide in the preparation of a GWM program at his facility.

The groundwater deficiencies identified in the Closure Plan denial letter from the Agency dated June 4, 1986 were discussed with Mr. Parke. Item #9 specifically states that "A groundwater monitoring and assessment program to detect any contaminants emanating from the surface impoundment must be proposed and implemented upon approval by the Agency."

After the office discussions, we continued on with a field inspection of the site and the RI groundwater wells. The 4 original Van Tran wells appeared to be intact with protective steel casing and PVC well casing. No PVC caps were on the wells, and I recommended that vented PVC caps be placed on the casing to prevent rust from entering the well. The surface seals on the 4 new RI wells (A, B, C & D) were severely cracked and I recommended to Mr. Parke that they be re-cemented to prevent surface or overland flow from entering the borehole. The new wells were constructed of stainless steel. Photos were taken at each of the wells at the facility.

Prior to departing the facility , Mr. Parke was informed that the previously charged apparent Subpart F violations would remain in effect until Van Tran proposes and implements a RCRA groundwater program, according to the regulations. Mr. Parke said that he would have his consultants, Baker Engineering, work on a RCRA Groundwater Plan and Sampling and Analysis Plan. Assuming that Van Tran follows through with those submittals, some or many of the previously charged Subpart F violations can be resolved.

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS
TREATMENT, STORAGE, AND DISPOSAL FACILITIES
Form A General Facility Standards

General Information

USEPA Number: NON-NOTIFIER IEPA Number: 0510350004

Major Facility: YES/NO Notified As: _____ Regulated As: E/TSD

(A) Facility Name: Van Tran Electric Corp.

(B) Street: 1505 Van Tran Avenue

(C) City: Vandalia (D) State: Illinois (E) Zip Code: 62471

(F) Phone: (618) 283-3220 (G) County: Fayette

(H) Operator: SAME AS ABOVE

(I) Street: _____

(J) City: _____ (K) State: _____ (L) Zip Code: _____

(M) Phone: _____ (N) County: _____

(O) Owner: Van Tran Electric Corp.

(P) Street: 7711 Imperial Drive

(Q) City: Waco (R) State: Texas (S) Zip Code: 76710

(T) Phone: (817) 772-9740 (U) County: _____

Region: 5 (V) Date of Inspection: 10/03/85 (W) Time: (From) 1:30 (To) 4:00

Type of Inspection: (ISS) RECORD REVIEW SAMPLING CITIZEN COMPLAINT
CLOSED WITHDRAWAL OTHER PART B
F/U ___/___/___ (Date of Initial Inspection)

(X) Weather Conditions: _____

Area	Section	Class I	Class II
OTH	703.150		1
OTH	722.111		1
OTH	725.113	1	
OTH	725.114	1	
OTH	725.115		1
OTH	725.116		1
OTH	725.133	1	
OTH	725.137		1
OTH	725.151, 155		2
OTH	725.173, 175		2
OTH	725.328	1	
OTH	725.329	1	
CL/PC	725.212		1
	725.242		1
TOTAL Class I's & II's		5	11

(AA) Preparer Information

Name
Michael D. Grant

Agency/Title
IEPA/ERS

Telephone
(618) 345-4606

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(Y) Person(s) Interviewed	Title	Telephone
Steve Parker	Vice President	(417) 772-9740
Greg Wolk	Attorney	(314) 241-8909
John Whitehead	Chemical Engineer	(219) 736-0263
Bob Smith	Plant Supervisor	(618) 393-3220

(Z) Inspection Participants	Agency/Title	Telephone
John Justice	IEPA / DAPC - EPE	(618) 997-4371
Nick Mallalieu	IEPA / DWPC - EPE	(618) 345-6220
Pat McCarthy	IEPA / DLPC - EPS	(618) 345-4606
Mike Grant	IEPA / DLPC - EPS	(618) 345-4606
Ron Jones	IEPA / DLPC - LSCT	(217) 785-5736

II. Section A: Scope of Inspection.

1. Interim Status standards for the treatment, storage or disposal of HAZARDOUS WASTES SUBJECT TO 35 Ill. Adm. Code 725.101. Complete Inspection Form A, Sections B, C, D, E, and G.

2. Place an "X" in the box(es) corresponding to the facility's treatment, storage or disposal processes, and generation and/or transportation activity (if any). Complete only the applicable sections and appendixes.

Permit application process(es) (EPA Form 3510-3)			Inspection Form A section(s)
S01	[X]	storage in containers	I
S02	[ ]	storage in tanks	J
T01	[ ]	treatment in tanks	J
S04	[X]	storage in surface impoundment	K, F
T02	[ ]	treatment in surface impoundment	K, F
D83	[ ]	disposal in surface impoundment	K, F
S03	[ ]	storage in waste pile	L
D81	[ ]	disposal by land application	M, F
D80	[ ]	disposal in landfill	N, F
T03	[ ]	treatment by incineration	O, P
T04	[ ]	treatment in devices other than tanks, surface impoundments, or incinerators	Q

No Part A has been filed.

Other Activities

GENERATOR	[X]	APPENDIX	GN
TRANSPORTER	[ ]	APPENDIX	TR

3. Indicate any hazardous waste processes, by process code, which have been omitted from Part A of the facility's permit application.

4. Indicate any hazardous waste processes (by process code and line number on EPA Form 3510-3 page 1 of 5) which appear to be eligible for exclusion per 35 Ill. Adm. Code 725.101(c). Provide a brief rationale for the possible exclusion.

III. GENERAL FACILITY STANDARDS:
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?		NA		
2. Facility expansion?		NA		
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?		✓		
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?		✓		
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?		NA		
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?		✓		
2. Artificial or natural barrier around facility?		✓		
3. Controlled entry?		✓		
4. Danger sign(s) at entrance?		✓		
(D) Do Owner or Operator Inspections Include:				Inspections not documented
1. Records of malfunctions?		✓		
2. Records of operator error?		✓		
3. Records of discharges?		✓		

*Not Inspected

	Yes	No	NI*	Remarks
4. Inspection schedule?	---	✓	---	
5. Safety, emergency equipment?	---	✓	---	
6. Security devices?	---	✓	---	
7. Operating and structural devices?	---	✓	---	
8. Inspection log?	---	✓	---	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	✓	---	Training Program has not been implemented
2. Job descriptions?	---	✓	---	
3. Description of training?	---	✓	---	
4. Records of training?	---	✓	---	
5. Have facility personnel received required training by 5-19-81?	---	✓	---	
6. Do new personnel receive required training within six months?	---	✓	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	---	NA	---	
2. No smoking signs?	✓	---	---	
3. Separation and protection from ignition sources?	✓	---	---	

*Not Inspected

IV. PREPAREDNESS AND PREVENTION:
(Part 265 Subpart C)

	Yes	No	NI*	Remarks
(A) Maintenance and Operation of Facility: Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent?		✓		
(B) If required, does the facility have the following equipment:				
1. Internal communications or alarm systems?	✓			
2. Telephone or 2-way radios at the scene of operations?	✓			
3. Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	✓			

Indicate the volume of water and/or foam available for fire control:

City Water

(C) Testing and Maintenance of Emergency Equipment:				
1. Has the owner or operator established testing and maintenance procedures for emergency equipment?		✓		Not Provided
2. Is emergency equipment maintained in operable conditions?		→		Indeterminate
(D) Has owner or operator provided immediate access to internal alarms? (if needed)	✓			

*Not Inspected

		Yes	No	NI*	Remarks
.)	Is there adequate aisle space for unobstructed movement?	✓			

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES: (Part 265 Subpart D)

		Yes	No	NI*	Remarks
(A)	Does the Contingency Plan contain the following information:				
1.	The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)		✓		A Contingency Plan has not been established
2.	Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?		✓		
3.	Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?		✓		
4.	A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?		✓		
5.	An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)		✓		

*Not Inspected

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?		✓	No operating record
2. Does the operating record contain the following information:			
**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?		✓	
c. The location and quantity of each hazardous waste within the facility?		✓	
***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)		NA	
e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?		✓	
f. Reports detailing all incidents that required implementation of the Contingency Plan?		✓	
g. All closure and post closure costs as applicable? (Effective 5-19-81)		✓	A closure plan has not been done.

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

(B) Are copies of available at organizations

(C) Emergency Coo

1. Is the fa Coordinat

2. Is coordi all aspect and emerge

3. Does the E have the a the Contin

(D) Emergency Proc

If an emergenc at this facili Coordinator fo procedures lis

(A) Use of Manifes

1. Does the f procedures processing

2. Are record retained f

(B) Does the owner requirements re discrepancies?

(C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73? — ✓ — No g

2. Does the operating record contain the following information:

**b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I? — ✓ — —

c. The location and quantity of each hazardous waste within the facility? — ✓ — —

***d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.) — NA — —

e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections? — ✓ — —

f. Reports detailing all incidents that required implementation of the Contingency Plan? — ✓ — —

g. All closure and post closure costs as applicable? (Effective 5-19-81) — ✓ — A cl been

** See page 33252 of the May 19, 1980, Federal Register.

*** Only applies to disposal facilities

*Not Inspected

VII. CLOSURE AND POST CLOSURE
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?		✓		
2. Has this plan been submitted to the Regional Administrator		✓		
3. Has closure begun?		✓		
4. Is closure estimate available by May 19, 1981?		✓		
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)		✓		But cannot be determined until closure of the impoundment.

VIII. FACILITY STANDARDS
(Part 265, Subparts I thru R)

I
USE AND MANAGEMENT OF CONTAINERS

Facility Name: Van Tran Electric Date of Inspection: 10/3/85

	Yes	No	NI*	Remarks
1. Are containers in good condition?	✓			
2. Are containers compatible with waste in them?	✓			
3. Are containers stored closed?	✓			
4. Are containers managed to prevent leaks?	✓			
5. Are containers inspected weekly for leaks and defects?		✓		
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	✓			

	Yes	No	NI*	Remarks
7. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)	NA			
8. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?	NA			

J
TANKS

Facility Name: _____ Date of Inspection: _____

1. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank?				
2. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
3. Do continuous feed systems have a waste-feed cutoff?				
4. Are waste analyses done before the tanks are used to store a substantially different waste than before?				
5. Are required daily and weekly inspections done?				
6. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)				
7. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR 265.17(b) apply.)				

*Not Inspected

	Yes	No	NI*	Remarks

8. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: _____ gallons

Tank diameter: _____ feet

Distance of tank from property line _____ feet

(See table 2 - 1 through 2 - 6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

K

SURFACE IMPOUNDMENTS

Facility Name: Van Tran Electric Corp. Date of Inspection: 10/3/85

1. Do surface impoundments have at least 60 cm (2 feet) of freeboard?			NA	See Remarks Concerning Surface Impoundment
2. Do earthen dikes have protective covers?			NA	
3. Are waste analyses done when the impoundment is used to store a substantially different waste than before?			NA	
4. Is the freeboard level inspected at least daily?			NA	
5. Are the dikes inspected weekly for evidence of leaks or deterioration?			NA	
6. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a surface impoundment? (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)			NA	
7. Are incompatible wastes stored in different impoundments? (If not, the provisions of 40 CFR 265.17(b) apply.)			NA	

	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	—	
4. Are inspection procedures followed according to 265.403?	—	—	—	
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	—	
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	—	

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	—	✓	—	No waste has been manifested off-site.
(B) Do the manifest forms reviewed contain the following information? (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	—	—	—	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	—	—	—	

	Yes	No	NI*	Remarks

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3. Name and EPA ID Number of Transporter(s)?	—	—	—	
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	—	—	—	
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	—	—	—	
6. The total quantity of waste(s) and the type and number of containers loaded?	—	—	—	
7. Required certification?	—	—	—	
8. Required signatures?	—	—	—	
(C) Does the owner or operator submit exception reports when needed?	—	—	—	

2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	—	NA	—	No waste ready for shipment off-site
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	—	—	—	
(C) If required, are placards available to transporters of hazardous waste?	—	—	—	

VI. RECORDKEEPING and REPORTING
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?		NA		No reports have been completed to retain.
(B) Has the generator submitted Annual Reports and Exception Reports as required?		✓		

VII. INTERNATIONAL SHIPMENTS
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?		✓		

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?				
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?				
c. Met the Manifest requirements?				
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?				

*Not Inspected

Omit Section 3 if the facility has interim status and its Part A permit application describes storage

3. On Site Accumulation

	Yes	No	NI*	Remarks
1. Are containers marked with start of accumulation date?	✓			
2. Are the containers of hazardous waste removed from installation before they can accumulate for more than 90 days?		NA		See Remarks
3. Are wastes stored in containers managed in accordance with 40 CFR Part 265.174 and 265.176 (weekly inspections of containers, containers holding ignitable or reactive wastes located at least 15 meters (50 Feet) from facility's property line?	✓			
4. If wastes are stored in tanks, are the tanks managed according to the following requirements?				
a. Are tanks used to store only those wastes which will not cause corrosion leakage or premature failure of the tank?		NA		
b. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, dikes, or other containment structures?		NA		
c. Do continuous feed systems have a waste-feed cutoff?		NA		
d. Are required daily and weekly inspections done?		✓		
e. Are reactive & ignitable wastes in tanks protected or rendered non-reactive or non-ignitable? (If waste is rendered non-reactive or non-ignitable, see treatment requirements?		NA		
f. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply)		NA		

*Not Inspected

REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

The facility was initally inspected on June 3, 1985 by Chuck Reeter and myself. During that inspection a pit was observed. The pit received paint and solvent waste. (See June 3, 1985 inspection checklist.) Since the June 3 inspection, five drums of soil were removed from the pit. Per Mr. Parke, the soil was placed in the drums on June 21, 1985. The pit was also backfilled, therefore the applicable areas of Section K on the checklist could not be addressed. The five drums have exceeded the 90-day requirements for a generator and are therefore in the storage mode. Until the pit goes through RCRA Closure, it is considered a Surface Impoundment and subject to the requirements of Interim Status.

This facility was a non-notifier, therefore, a formal RCRA program has not been implemented. The waste generated at the facility (since the June inspection) appears to be managed properly. However, there were no analyses available for three additional waste streams.

The additional waste streams are:

1) the filter media which is used to filter the transformer oil,
2) the material which is skimmed off the water which is utilized in the paint booth air emission control device, and
3) the filters associated with the aforementioned air emission control device.

The two waste streams which Van Tran has determined to be hazardous are filter media and the spent solvent from the painting process. Since the June inspection, the solvent and paint waste are put into a drum which was labelled properly. The filter media is used to reclaim solvents. Transformer tanks are wiped down with solvent to remove the oils. The spent solvent is poured into a five gallon bucket filled with filter media. The media absorbs the oils and the solvent exits through a hole in the bottom of the bucket, which is collected in another bucket. There were two five gallon buckets of filter media which were also labelled properly. Now that Van Tran is properly handling these wastes, the 90 day accumulation time can be applied.

Mr. Parke said that a notification had been submitted to USEPA to obtain a USEPA ILD#. On October 4, 1985, I called Mary Villareal, USEPA, Region V to inquire whether a notification from Van Tran had been received. She said that it was received on September 24, 1985.

The following apparent violations were observed on this date:

1) 703.150	7) 725.133	13) 725.212
2) 722.111	8) 725.137	14) 725.242
3) 725.113	9) 725.151	15) 725.274
4) 725.114	10) 725.155	16) 725.328(c)
5) 725.115	11) 725.173	17) 725.329
6) 725.116	12) 725.175	

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